

(DISCUSSION DRAFT)

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Application by SBC Communications Inc.,
Illinois Bell Telephone Company d/b/a
Ameritech Illinois, and Southwestern Bell
Communications Services, Inc. d/b/a
Ameritech Long Distance
Pursuant to Section 271 of the
Telecommunications Act of 1996 to
Provide In-Region, InterLATA Services
in Illinois

CC Docket No. _____

**BRIEF IN SUPPORT OF APPLICATION
BY SBC COMMUNICATIONS, INC., AMERITECH ILLINOIS,
AND AMERITECH LONG DISTANCE FOR PROVISION
OF IN-REGION, INTERLATA SERVICES IN ILLINOIS**

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EXECUTIVE SUMMARY

With this application, Ameritech Illinois seeks authority to provide long-distance telecommunications services to the citizens of Illinois. This application reflects the successful efforts by Ameritech Illinois and the Illinois Commerce Commission (“ICC”) to open the local market to competition. It marks a significant turning point for Illinois consumers. And it presents the State of Illinois the opportunity, not only to recognize the market-opening initiatives already undertaken in the local market, but also to realize the benefits of full competition in all markets, local and long-distance, that flow from Section 271 approval.

Even before Congress passed the Telecommunications Act of 1996, Ameritech Illinois and the ICC have worked to achieve the goal of competition in all telecommunications markets. Since of , those efforts coalesced into a comprehensive and exhaustive set of collaborative proceedings, in which Ameritech Illinois – with open participation from competing local exchange carriers (“CLECs”) and active supervision by the ICC – developed and implemented a number of enhancements designed to keep pace with evolving rules and technologies, to maintain and assure compliance with Section 271’s competitive checklist, and to address concerns raised by the CLECs. This application describes the fruits of those efforts.

Section 271(c)(1)(A). Local competition has taken root and is growing rapidly in Illinois. AT&T, WorldCom, and Focal, along with many other CLECs, serve residential and business subscribers in Illinois, either exclusively or predominantly over their own facilities. Ameritech Illinois has entered into ICC-approved interconnection and resale agreements with approximately ____ wireline CLECs. As a result, competing carriers have installed switching capacity that gives them the capability to serve ____ of the customers in Ameritech Illinois’ service areas, and their

existing collocation arrangements with Ameritech Illinois allow them to reach ___ percent of Ameritech Illinois' business customers and ___ percent of residential customers. See Section I infra.

Section 271(c)(2)(B) Competitive Checklist. Ameritech Illinois has implemented the competitive checklist of Section 271(c)(2)(B) by entering into binding legal obligations (both in the form of interconnection agreements with competing carriers, along with ICC tariffs) to provide each of the fourteen checklist items, on terms and conditions that comply with the 1996 Act and the FCC's regulations. The ICC has conducted extensive proceedings and has approved, as consistent with cost-based principles, the rates for services that run the gamut of the checklist, from advanced services through line sharing and reciprocal compensation to unbundled access to network elements.

To help provide this array of products and services, Ameritech Illinois offers requesting carriers multiple electronic and manual options to access the same operations support systems ("OSS") functions (pre-ordering, loop qualification, ordering, provisioning, repair and maintenance, and billing) that are available to Ameritech Illinois' own retail operations. In recent months Ameritech Illinois has developed and implemented a series of OSS enhancements that reflect the state of the art in industry standards, similar initiatives by Southwestern Bell, and extensive input from CLECs in Illinois and throughout the Ameritech region.

These commitments are backed by a set of over 160 performance measures and standards designed to both monitor and assure Ameritech Illinois' ongoing compliance with its obligations and its continued satisfaction of market-opening commitments. These measures and standards are modeled on, and in virtually all respects the same as (or even more stringent than), those

approved by the FCC for Texas, Kansas and Oklahoma. They were developed as a result of extensive discussion with CLECs in ICC-supervised collaborative sessions, and received the support of the participating CLECs. See Section II infra.

Public Interest. Ameritech Illinois' commitment to competition goes beyond the date of the application, and is designed to last long after interLATA relief is granted. Ameritech Illinois is subject to a comprehensive performance assurance plan, including a regimen of substantial self-executing remedies to be paid to CLECs and to the State of Illinois should performance fail to meet the ICC-approved standards. The ICC, too, has demonstrated that it will continue to play an active role in maintaining local competition well beyond the date of section 271 approval.

One need look no further than the states in which the FCC has already granted section 271 relief to see the benefits that section 271 approval will have in Illinois. Entry by Bell Operating Companies – like SBC companies in Texas, Kansas and Oklahoma – has spurred long-distance carriers to compete more actively in their own market and to enter more aggressively into the local market. The ultimate beneficiaries in all these markets are consumers, who benefit from increased choice and innovative service offerings. See Section III infra.

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- Tab 1. Scott J. Alexander
(Interconnection; Access to Network Elements; Unbundled Local Loops;
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- Tab 2. Justin W. Brown
(Local Services Center and Local Operations Center)
- Tab 3. Mark Cottrell
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- Tab 4. William C. Deere
(Interconnection; Access to Network Elements; Unbundled Local Loops;
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- Tab 5. Salvatore T. Fioretti
(Performance Monitoring)
- Tab 6. Richard J. Florence
(Cost Studies)
- Tab 7. Patrick L. Foster
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- Tab 8. XXX XXXX
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- Tab 9. John S. Habeeb
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- Tab 10. Patrick A. Harrison
(Access to 911)
- Tab 11. Deborah O. Heritage
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- Tab 12. Robben Kniffen-Rusu
(Access to White Pages Directory Listings)

- Tab 13. Denise Kagan
(Billing)
- Tab 14. Jeffrey A. Mondon
(Number Portability)
- Tab 15. Jeffrey A. Mondon
(Access to Telephone Numbers)
- Tab 16. Don Thompson
(Account Management)
- Tab 17. Jan D. Rogers
(Operator Services, Directory Assistance)
- Tab 18. Michael D. Silver
(Advanced Services)
- Tab 19. Marcia J. Stanek
(Access to Poles, Ducts, Conduits, and Rights-of-Way)
- Tab 20. To Be Filed at FCC
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**BRIEF IN SUPPORT OF APPLICATION
BY AMERITECH ILLINOIS FOR PROVISION
OF IN-REGION, INTERLATA SERVICES IN ILLINOIS**

Pursuant to Section 271(d) of the Telecommunications Act of 1996 (“the 1996 Act” or “the Act”), SBC Communications Inc., Ameritech Illinois, and Ameritech Long Distance submit this Brief in support of their Application to the Federal Communications Commission (“FCC”) for Southwestern Bell Communications Services, Inc. d/b/a Ameritech Long Distance to provide in-region, interLATA services, and services treated as such under Section 271(j) of the Act, in Illinois.¹

¹ This Brief generally refers to Illinois Bell Telephone Company d/b/a Ameritech Illinois, the “Bell operating company” (“BOC”) providing service within the State of Illinois, as “Ameritech Illinois.” The term “Ameritech” encompasses Ameritech Corporation and all of its affiliates. However, Ameritech’s wholly-owned long distance affiliate, Southwestern Bell Communications Services, Inc. d/b/a Ameritech Long Distance, is referred to as “Ameritech

July 30, 2001

INTRODUCTION

This application represents the culmination of extensive efforts by the Illinois Commerce Commission (“ICC”) and Ameritech Illinois, working with competing local exchange carriers (“CLECs”), to foster the emergence of effective local competition, to address the concerns identified in previous section 271 proceedings, and to keep pace with continued evolution in technology and legal requirements.

One of the important milestones in this process was the ICC’s review and approval of the SBC/Ameritech merger. _____ Aff. ¶ _____. As a condition of approval, the ICC initiated a series of rigorous, comprehensive, and collaborative processes to both ensure and demonstrate checklist compliance. Id. The collaborative proceedings were open to all interested parties, and the ICC invited all interested parties to participate. Id. The ICC also took advantage of parallel collaborative proceedings in other states throughout the SBC and Ameritech regions, and of the proceedings and conditions that led to approval of the SBC/Ameritech merger by the FCC and by other state commissions in the Ameritech region. Where collaborative sessions were held in the other Ameritech states, their results were imported to Illinois: for example, many OSS enhancements and operational process improvements were addressed in Wisconsin collaboratives and then imported to Illinois. Id. ¶ ____.

Long Distance” where necessary to distinguish it from other Ameritech affiliates. Because Ameritech seeks authority on behalf of Ameritech Long Distance, and any wholly-owned subsidiaries it may later create or acquire, to provide interLATA services in Illinois, references to Ameritech Long Distance also encompass any wholly-owned affiliates of Ameritech Long Distance.

The fruits of the extensive work of the ICC, its staff, Ameritech Illinois, and the CLEC community are detailed throughout this brief and the supporting affidavits and attachments. To highlight a few of the most significant developments:

1. Ameritech Illinois has filed tariffs with the ICC and offered to CLECs a Illinois Legislative Amendment or “ILA,” interconnection agreement amendment that governs rates, terms and conditions for existing and new combinations of unbundled network elements, including the unbundled network element “platform”, and Enhanced Extended Links to effectuate IL HB2900. See Section II.B.2 infra.

2. The ICC has approved rates based on TELRIC principles for most of the products and services made available to CLECs by Ameritech Illinois. See Sections II.B.3 and II.B.4 infra.

3. Ameritech Illinois has implemented numerous enhancements to the operations support systems (“OSS”) that help it provide the various checklist items. These improvements have been set forth in a Plan of Record for Uniform and Enhanced OSS filed with the FCC – without any disputed or unresolved issues – as a condition of approval of the SBC/Ameritech merger. They have also been documented in a parallel Plan of Record reviewed and approved by the ICC in Docket No. 00-0592, and they are binding upon Ameritech Illinois. See Section II.B.5 infra.

4. With extensive input from competing carriers, Ameritech Illinois has developed and instituted procedures to ensure timely and smooth coordinated cut-overs of unbundled loops and to provide access to network interface devices (Section II.D infra).

5. Ameritech Illinois has fully implemented long-term number portability (“LNP”), which enables end users to change carriers while keeping their telephone numbers. LNP is

available not just in those areas where implementation is required by the FCC's rules, but in every single one of Ameritech Illinois' ____ switches. As a result, CLECs have ported over ____,000 telephone numbers from Ameritech Illinois. See Section II.K infra.

6. To help monitor Ameritech Illinois' ongoing performance of its numerous obligations and commitments, Ameritech Illinois has implemented (by agreement with CLECs in the collaborative process) a comprehensive plan of over 160 detailed performance measurements: divided into several thousand product and service categories, defined by precise business rules, tested by annual audits, and governed by rigorous standards. The performance plan, modeled on similar plans approved by the FCC in its section 271 orders for Texas, Kansas, and Oklahoma (and in its conditions for approval of the SBC/Ameritech merger) reflects further input from the ICC and from CLECs participating in the collaborative process. See Sections II.B.5 and III.B infra.

7. To help enforce these approved performance standards, the ICC has adopted and ordered Ameritech Illinois' plan for a system of self-executing remedies to be paid to CLECs and/or the State of Illinois. Like the underlying performance standards it is designed to enforce, the remedy plan is based on similar plans approved by the FCC in its approval of section 271 relief for Southwestern Bell in Texas, Kansas, and Oklahoma. See Section III.B infra.

The purpose of this filing is to demonstrate the efforts taken by Ameritech Illinois and the ICC to date. Ameritech Illinois' commitment to checklist compliance, and the ICC's efforts to ensure compliance, are ongoing. At this time, KPMG (which the FCC has commended for "detailed and comprehensive" efforts that it found "critical to the success" of the landmark New York 271 proceedings, New York 271 Order, ¶ 10) is conducting an independent third-party test of Ameritech Illinois' OSS. KPMG is proceeding under an exhaustive Master Test Plan, which

was developed on a collaborative basis using experience from other states, including New York and Florida, as a guide. _____ Aff. ¶¶ _____. Along with the test results, Ameritech Illinois plans to present actual OSS performance data for the ICC to review in assessing Ameritech Illinois' provision of nondiscriminatory access to OSS. Id. ¶ ____.

DISCUSSION

I. AMERITECH ILLINOIS IS ELIGIBLE TO SEEK INTERLATA RELIEF UNDER SECTION 271(C)(1)(A)

By almost any measure, competition is growing rapidly in Illinois. Between March 2000 and March 2001, CLECs' facilities-based lines increased by ___ percent, and UNE loops nearly doubled. See Heritage Aff. ¶ ____ & Attach. ____ CLECs' existing collocation arrangements allow them to serve more than ___ percent of the business customers and ___ percent of the residential customers in Ameritech Illinois' service area. Id. ¶ ____ & Table ____ The CLECs' installed switching capacity is capable of serving ___ of the customers in Ameritech Illinois' serving area. Id. ¶ ____ & Table ____ Moreover, although most CLECs in Illinois, like elsewhere, concentrate on major metropolitan areas, local competition is arriving in rural areas as well. CLECs are currently serving customers in _____ (population ____), _____ (population ____), and _____ (population ____). Id. ¶ ____.²

Ameritech Illinois has lost approximately ___ percent of its total lines to unaffiliated carriers. Heritage Aff. ____ & Table ____ As of March 2001, between _____ and _____ of these lines are served by competitors over their own facilities. See id., Table ____ CLECs have

² Ameritech Illinois has approximately 144 approved wireline interconnection and resale agreements with CLECs. See Heritage Aff. ¶ ____.

captured at least _____ business lines, and at least _____ residential lines, in Ameritech Illinois' service area. See id., Table _____. Clearly, CLECs are providing Illinois consumers "an actual commercial alternative."³ See id., ¶ ____ & Attach. ____ (articles reporting on CLEC solicitation of customers in Illinois).

The table below reflects the extent of CLEC activity in Illinois at the end of March 2001:

CLEC ACTIVITY IN ILLINOIS

FACILITIES-BASED					RESALE	
UNE Platforms	Interconnection Trunks	Unbundled Stand Alone Loops	E911 Listings	Ported Numbers	Business* Lines	Residential Lines

*includes coin

See Heritage Aff. ¶¶ _____, & Attach. ____.

At least _____ CLECs are providing services to residential and business subscribers in Illinois, either exclusively or predominantly over their own facilities (Heritage Aff. ¶ ____ & Attachment ____), thereby establishing that Ameritech Illinois satisfies Track A. See 47 U.S.C. § 271(c)(1)(A). These "Track A" carriers include both well established brand names and new entrants. For example, AT&T has several operational voice switches in Illinois, and provides facilities-based service to _____ of residential and business subscribers. See id., Attach. ____ ¶¶ ____; see also Michigan 271 Order, 12 F.C.C. Rcd. at 20598, ¶ 101 (service provided through

³ Memorandum Opinion and Order, Application of Ameritech Illinois Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region, InterLATA Services In Michigan, 12 F.C.C. Rcd. 20543, 20585, ¶ 77 (1997) ("Michigan 271 Order"); see Kansas/Oklahoma Order ¶ 42. While many facilities-based carriers in Illinois have substantial numbers of subscribers, there is no statutory requirement that a qualifying CLEC under section 271(c)(1)(A) serve any particular quantity of customers. See Michigan 271 Order, 15 F.C.C. Rcd. at 20584-85, ¶¶ 76-77. Congress rejected metric tests of actual competition in favor of a

UNEs is facilities-based for purposes of Track A). Likewise, WorldCom offers service largely over its own facilities to _____ business and residential customers. *Id.* Attach. C ¶¶ ____.

Additional CLECs such as McLeodUSA, Focal, XO, CoreCom, Allegiance, individually and/or collectively, also qualify as Track A providers under the standards developed in prior FCC decisions.⁴ *See* Heritage Aff. Attach. ____.

II. AMERITECH ILLINOIS' ICC-APPROVED AGREEMENTS SATISFY ALL REQUIREMENTS OF THE COMPETITIVE CHECKLIST

Because the “competitive checklist” of section 271(c)(2)(B) incorporates substantive requirements of section 251, it allows the FCC to verify that Congress’s “three paths of entry into the local market – the construction of new networks, the use of unbundled elements of the incumbent’s network, and resale” – are available in practice.⁵ Part II of this Brief comprehensively addresses Ameritech Illinois’ compliance with the detailed requirements of the checklist and the implementing orders of the FCC and ICC. In many cases, this compliance is established through the same or similar systems, processes, and procedures that were found sufficient for section 271 relief in Texas, Kansas, and Oklahoma.

clear statutory “test of when markets are open.” 141 Cong. Rec. S8188, S8195 (daily ed. June 13, 1995) (statement of Sen. Pressler).

⁴ *See Michigan 271 Order*, 12 F.C.C. Rcd. at 20587-88, ¶ 82 (“when a BOC relies upon more than one competing provider to satisfy section 271(c)(1)(A), each such carrier need not provide service to both residential and business customers”); *Kansas & Oklahoma 271 Order* ¶ 43 n.101 (holding that Track A can be satisfied where “competitors’ service to residential customers is wholly through resale”) (quoting Memorandum Opinion and Order, *Application of BellSouth Corp., et al., for Provision of In-Region, InterLATA Services in Louisiana*, 13 F.C.C. Rcd. 20599, 20635, ¶ 48 (1998) (“*Second Louisiana 271 Order*”)).

⁵ Memorandum Opinion and Order, *Application of BellSouth Corporation, et al. Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region, InterLATA Services In South Carolina*, 13 F.C.C. Rcd. 539, 545-46, ¶¶ 10-11 (1997) (“*South Carolina 271 Order*”).

As explained below, any CLEC can obtain from Ameritech Illinois the facilities and services it needs to provide local service in Illinois, no matter what mode of entry the CLEC selects. To insure that this is so, Ameritech Illinois has “a concrete and specific legal obligation to furnish [each checklist] item upon request” and has done what is necessary to supply those items “in the quantities that competitors may reasonably demand and at an acceptable level of quality.” Michigan 271 Order, 12 F.C.C. Rcd. at 20601-02, ¶ 110. The following sections (and the affidavits and other materials supporting them) discuss Ameritech Illinois’ offerings and the associated network arrangements for each checklist item.

A. Checklist Item 1: Interconnection

1. Interconnection Trunking

Ameritech Illinois satisfies Checklist Item 1 by making available all required forms of interconnection. Ameritech Illinois makes Fiber-Meet Interconnection available at any mutually agreeable, economically and technically feasible point between a CLEC’s premises and an Ameritech Illinois tandem or end office. Deere Aff. ¶ ___. The Fiber-Meet arrangement may be used to provide interoffice trunking for originating and terminating calls between the two networks or for transit of calls to or from a third party via Ameritech Illinois’ tandem switch. Id. ¶ __; see also ¶¶ ____ (discussing types of Fiber-Meet arrangements). CLECs can interconnect to Ameritech Illinois at the trunk-side or line-side of the local switch, trunk connection points of a tandem switch, central office cross-connect points, out-of-band signaling transfer points, and points of access to UNEs, as well as other technically feasible points upon request. Id. ¶¶ ____; 47 C.F.R. § 51.305(a)(2). At their discretion, CLECs can obtain a single point or multiple points of interconnection per LATA. Deere Aff. ¶ ___.

The Affidavit of William C. Deere discusses interconnection interoffice trunking arrangements for various types of traffic between a CLEC and Ameritech Illinois. Deere Aff. ¶¶ _____. Forecasting and servicing of interconnection trunk groups are based upon the same industry standard objectives that Ameritech Illinois uses for its own trunk groups. Id. ¶ ____; see also ¶¶ _____ (discussing forecasting requirements and procedures). Ameritech Illinois also uses standard trunk traffic engineering methods to ensure that interconnection trunking is managed in the same manner as trunking for Ameritech Illinois' own local services. Id. ¶ _____. Ameritech Illinois accommodates CLEC requests for one-way or two-way trunking when technically feasible. Id. ¶¶ _____. In order to ensure equality, Ameritech Illinois interconnects with CLECs using the same facilities, interfaces, technical criteria, and service standards as for its own retail operations. Id. ¶ ____.

Ameritech Illinois has implemented multiple performance measurements and standards to govern interconnection trunking. See Fioretti Aff. ¶¶ _____. As with the other measurements and standards herein, they were developed in collaborative proceedings with CLEC input, and they have been submitted to the ICC by a Joint Motion of the collaborative participants in ICC Docket No. 01-0120. Id. ¶ _____. The principal measure tracks the rate of call blockage: blockage on call attempts from Ameritech Illinois customers that are to be routed to and terminated on CLEC networks, as compared to the blockage rate for traffic that both originates and terminates on Ameritech Illinois facilities. Id. ¶ _____. The call blockage rate reflects the actual volume and source of traffic that is affected, adjusting for calls that are re-routed and successfully completed over other facilities. Id. ¶ ____.

Ameritech Illinois also reports on trunk blockage (PM 71), average installation intervals (PM 78), missed due dates (PM 73), the length of delays for missed due dates (PM 74), and trunk

restoration intervals (PMs 76, 77). Id. ¶¶ _____. These are the very same “clearly defined performance measurements and standards” developed in Texas. Texas 271 Order, 15 F.C.C. Rcd. at 18357, ¶ 3; Kansas & Oklahoma 271 Order ¶ 3.⁶

2. Collocation

In accordance with Section 251(c)(6), 47 C.F.R. § 51.321, and 47 C.F.R. § 51.323, Ameritech Illinois makes available to CLECs collocation of telecommunications equipment for interconnection and access to unbundled network elements. See Alexander Aff. ¶ ____; Deere Aff. ¶ _____. Ameritech Illinois’ terms and conditions for collocation are provided in interconnection agreements and in its effective tariff. Alexander Aff. ¶ _____. In addition, a CLEC may negotiate and/or arbitrate terms and conditions for collocation as part of its own interconnection agreement with Ameritech Illinois. Id. Ameritech Illinois’ interconnection agreements incorporate and are compliant with the FCC’s collocation requirements as set forth in the Advanced Services Order⁷ and the Advanced Services Reconsideration Order.⁸ Alexander Aff. ¶ _____. A CLEC can apply for collocation space even while that CLEC’s state certification is still pending, or before the CLEC and Ameritech Illinois have entered into a final interconnection agreement. Id. ¶ ____.

⁶ In re Joint Application by SBC Communications Inc., et al. for Provision of In-Region, Interlata Services in Kansas and Oklahoma, CC Docket No. 00-217, 2001 WL 55637 (Jan. 22, 2001) (“Kansas & Oklahoma 271 Order”).

⁷ First Report and Order and Further Notice of Proposed Rulemaking, Deployment of Wireline Services Offering Advanced Telecommunications Capability, 14 F.C.C. Rcd. 4761 (1999) (“Advanced Services Order”).

⁸ Order On Reconsideration And Second Further Notice Of Proposed Rulemaking In CC Docket No. 98-147 And Fifth Further Notice Of Proposed Rulemaking In CC Docket No. 96-98, Deployment of Wireline Services Offering Advanced Telecommunications Capability, 15 F.C.C. Rcd. 17806 (2000) (“Advanced Services Reconsideration Order”).

Physical collocation of CLEC equipment is available where space permits. See Alexander Aff. ¶¶ ____; Deere Aff. ¶ _____. Ameritech Illinois makes available caged, shared cage, cageless and other physical collocation arrangements, all at the option of the CLEC. See Alexander Aff. ¶¶ ____; Deere Aff. ¶ _____. These offerings fully comply with the FCC's collocation rules, as well as the ICC's orders. Alexander Aff. ¶ ____.

Adjacent space collocation is available on Ameritech Illinois' premises when all space for physical collocation within an Ameritech Illinois Eligible Structure is legitimately exhausted. Alexander Aff. ¶ ____; Deere Aff. ¶ _____. If space in an Eligible Structure subsequently becomes available, the CLEC may, at its option, relocate its equipment into that interior space. Alexander Aff. ¶ ____; 47 C.F.R. § 51.323(k) (as revised by the Advanced Services Reconsideration Order, ¶ 46). Ameritech Illinois also will make available other technically feasible collocation arrangements consistent with Paragraph 45 of the Advanced Services Order, which provides that "deployment by any incumbent LEC of a collocation arrangement gives rise to a rebuttable presumption in favor of a competitive LEC seeking collocation in any incumbent LEC premises that such an arrangement is technically feasible." See Alexander Aff. ¶ ____.

Detailed terms for collocation are spelled out in Technical Publication TP 76300MP, Installation Requirements, which is incorporated by reference in the Appendix Physical Collocation. Id. ¶ _____. CLECs obtaining physical collocation also receive access via the CLEC Online website to Ameritech Illinois' Interconnector's Collocation Services Handbook for Physical Collocation. Id.

Denials of Request. If Ameritech Illinois must deny a CLEC's request for physical collocation because space is not available, Ameritech Illinois will furnish to the CLEC detailed documentation relating to the denial within ten days. Alexander Aff. ¶ _____. Ameritech Illinois

has also modified its internal procedures to ensure that, if it denies collocation on the grounds that a CLEC's equipment fails to meet applicable safety standards, the FCC-required affidavit will contain all the information required by the Advanced Services Reconsideration Order, ¶ 57 (revising 47 C.F.R. § 51.323(b)). Alexander Aff. ¶¶ _____. Furthermore, if space is not available to accommodate the CLEC's request, the CLEC may request a tour of the premises. Id. ¶ _____. Consistent with 47 C.F.R. § 51.321(f), this tour will be scheduled within five business days from the date the written request for such a tour is received from the CLEC. Id.

In addition, Ameritech Illinois maintains a publicly available document on the Internet indicating those of its premises, if any, that currently are full; this list is updated within ten days of the date a central office is determined to be out of physical collocation space. Id. ¶ _____. Ameritech Illinois ensures that only offices that do not have a minimum of one bay space for physical collocation are posted on this list. Id. ¶ _____. Moreover, prior to submitting an application for physical collocation, a CLEC may request a report that indicates the available collocation space in a particular Ameritech Illinois premises. Id. ¶ _____.

Space Reservation. Ameritech Illinois' space reservation policies are nondiscriminatory. Id. ¶ _____. As required by 47 C.F.R. § 51.323(f), Ameritech Illinois does not and will not allow any of its affiliates to reserve space on terms more favorable than those that apply to collocation. Id.; Advanced Services Reconsideration Order, ¶ 53. Moreover, Ameritech Illinois has adopted a number of policies that conserve collocation space and maximize opportunities for carriers to enter or to expand their presence in the local market. Alexander Aff. ¶ _____. For instance, Ameritech Illinois will remove obsolete unused equipment upon reasonable request by a collocater or upon order of the state commission. Id. Ameritech Illinois also conserves caged

collocation space by allowing CLECs to purchase space in increments as small as the amount of space needed to house and maintain a single rack or bay of equipment. Id. ¶ __; Deere Aff. ¶ __.

Ameritech Illinois employs security measures for collocators in its central offices to reasonably protect its network and equipment from harm, and these measures are no more stringent than those followed by Ameritech Illinois' own personnel. Alexander Aff. ¶ __. CLEC personnel are not required to undergo security training that is more stringent or intensive than the training undergone by Ameritech Illinois personnel, nor are they required to obtain training from Ameritech Illinois. Id. ¶ __. Nor does Ameritech Illinois impose more stringent security measures than those permitted by the FCC. Id. ¶ __; Advanced Services Order, ¶¶ 46-49. Consistent with the Advanced Services Order (¶¶ 42, 48), Ameritech Illinois may recover the costs of erecting an interior security partition to separate Ameritech Illinois' own equipment in lieu of the costs of other reasonable security measures. See Alexander Aff. ¶ __. Such a security partition will not interfere with a CLEC's access to its own equipment, and will not be the basis for a claim that collocation space is exhausted. Id. ¶ __. Ameritech Illinois does not use information obtained from CLECs in the course of implementing security arrangements for marketing or other competitive purposes. Id. ¶ __.

CLECs have access to their physically collocated equipment 24 hours a day, seven days a week, without a security escort, as well as access to restrooms and parking. Id. ¶ __. CLECs also have reasonable access to their chosen collocation space during construction. Id. ¶ __; see Advanced Services Reconsideration Order, ¶ 59.

Ameritech Illinois requires that all equipment to be collocated in its Eligible Structures meet Level 1 safety requirements as set forth in publication TP 76200MP. Alexander Aff. ¶ __.⁹ However, Ameritech Illinois may not impose safety requirements on collocators that are more stringent than the safety requirements it imposes on its own equipment. Id. Ameritech Illinois may not deny collocation of a collocator's equipment if it fails to meet TP 76200MP reliability standards. Id.; see Advanced Services Reconsideration Order, ¶ 55.

Intervals. Ameritech Illinois' interconnection agreements and tariffs establish processes and procedures to ensure that collocation arrangements are available on terms and conditions that are just, reasonable, and nondiscriminatory in accordance with Section 251(c)(6) of the 1996 Act. Alexander Aff. ¶ __. These include standards in Ameritech Illinois' approved interconnection agreements and tariffs regarding the length of time required to process and implement requests for collocation. Id. Ameritech Illinois provisions collocation space in full conformity with the criteria established by the FCC in its Advanced Services Reconsideration Order and by the ICC in Docket Nos. 99-0615 and 96-0486/96-0569 regarding collocation costs, rates, terms and conditions. Id.

Ameritech Illinois typically notifies a requesting collocator whether its request for collocation space has been granted or denied due to a lack of space within ten days of submission of the completed application. Alexander Aff. ¶ However, a collocator may obtain a shorter interval for the return of price quotes by scheduling a meeting with Ameritech Illinois at least 20 business days prior to the submission of the first application to discuss, coordinate, and prioritize the applications. Id. ¶ __.

⁹ This document is available in the CLEC Online Handbook at <<https://sbc.clec.com>>.

Ameritech Illinois also provides specific construction intervals, pursuant to its interconnection agreements and tariffs. For caged physical collocation, including shared caged, Ameritech Illinois provides a 90-day construction interval for Active Collocation Space.¹⁰ Alexander Aff. ¶ __. The interval for caged collocation is 180 days for Other (Inactive) space, reflecting the engineering and construction time necessary to convert inactive space to active collocation space. Id. These application and provisioning intervals allow Illinois CLECs to obtain collocation in a timely manner and are consistent with the FCC's regulations. Id.; Advanced Services Reconsideration Order, ¶ 21; 47 C.F.R. § 51.323(l).

Ameritech Illinois has established, and the ICC has approved, performance measurements and standards to demonstrate the timeliness of processing collocation applications. Alexander Aff. ¶ __; Fioretti Aff. ¶¶ _____. These include the percentage of requests processed within established timelines, the rate of missed due dates, and the average delay on missed due dates, all of which are identical to measures approved in the Texas 271 Order. Id.

Additional Requests. In addition to requests for initial collocation space, Ameritech Illinois accommodates requests to augment existing collocation arrangements, with shortened intervals for such requests. Alexander Aff. ¶ __.

Virtual collocation is available to CLECs regardless of the availability of physical collocation. Alexander Aff. ¶ __. Ameritech Illinois uses the same engineering practices for virtually collocated equipment as it does for similar equipment of its own. Id. ¶ __. Ameritech Illinois will maintain and repair virtually collocated equipment using the same standards that

¹⁰ "Active Collocation Space" means space within a structure eligible for collocation, which has sufficient infrastructure systems, including power. Any other space is referred to as "Other (Inactive)" space. Alexander Aff. ¶ __.

Ameritech Illinois uses for maintaining and repairing its own equipment. Id. ¶ __. Intervals for virtual collocation are provided in accordance with ICC-approved performance standards. Id. ¶ __.

3. Pricing for Interconnection

As demonstrated below, in item 4 for checklist item 2 (access to unbundled network elements), Ameritech Illinois provides interconnection and physical and virtual collocation at rates that comply with all FCC and statutory requirements.

B. Checklist Item 2: Access to Network Elements

1. Access to UNEs Generally

Ameritech Illinois satisfies Checklist Item 2 by providing “nondiscriminatory access to network elements on an unbundled basis at any technically feasible point on rates, terms, and conditions that are just, reasonable, and nondiscriminatory” through its approved interconnection agreements and tariffs. 47 U.S.C. §§ 251(c)(3) & 271(c)(2)(B)(ii), 252(d)(1). This offer of leased access to individual components of Ameritech Illinois’ local exchange network enables CLECs to serve their local customers without duplicating Ameritech Illinois’ multi-billion dollar investment in local network infrastructure.

2. UNE Combinations

Existing Combinations. In compliance with 47 C.F.R. § 51.315(b), Ameritech Illinois does not separate UNEs that are currently physically combined in its network unless a CLEC requests that it do so. Alexander Aff. ¶ __. Ameritech Illinois provides UNEs in a manner that allows CLECs to combine them by making certain collocation arrangements – including caged, shared-caged, adjacent and cageless physical collocation – available for that purpose. Id. ¶ __. CLECs are not restricted to these methods of combining UNEs and can request other technically

feasible methods of access that are consistent with the 1996 Act and other governing statutes and decisions. Alexander Aff. ¶ ____.

The various collocation options, and Ameritech Illinois' offer to combine certain UNEs for CLECs under the ILA (discussed below) provide multiple methods for CLECs to obtain UNEs without owning or controlling any other local exchange facilities. Alexander Aff. ¶ ____.

Facilities-based CLECs can use these same methods to combine Ameritech Illinois' network elements with their own facilities.

New Combinations. Ameritech Illinois also makes available new UNE combinations, which goes beyond current federal requirements under the 1996 Act. Under a tariff and an ILA, when requested to do so, Ameritech Illinois will combine particular network elements that are not already combined, including new loop to switch port combinations (the "UNE Platform" or "UNE-P") and, under certain conditions, loop to interoffice transport combinations (the "Enhanced Extended Loop" or "EEL"). Alexander Aff. ¶¶ ____; see ILA . Ameritech Illinois has developed methods and procedures for ordering and provisioning these new UNE combinations. See ILA . The tariff and ILA is available to all CLECs in Illinois on a legally binding basis and was brought to all CLECs' notice by a tariff filing and an Accessible Letter and posting on Ameritech's CLEC website. See Alexander Aff. ¶¶ ____; ILA. The tariff and ILA provisions regarding combination of UNEs are substantively similar to those contained in SWBT's T2A, K2A, and O2A, which the FCC has already found satisfy section 271, except that Ameritech offer has no contingency related to Ameritech's 271 application. Alexander Aff. ¶ ____; see Texas 271 Order ¶ 218 & n.604, ¶ 224; Kansas & Oklahoma 271 Order ¶¶ 172-173 & n.490. These provisions should again be found to satisfy section 271.

In addition to new UNE-Ps, under the tariff and ILA Ameritech Illinois will combine unbundled loops with unbundled dedicated transport to provide certain new EEL arrangements. See Alexander Aff. ¶¶ ____; ILA. The terms and conditions associated with Ameritech Illinois' agreement to assemble new EEL combinations are more generous than required under the UNE Remand Order, which addressed only “existing combinations of loop and transport between the end user and the incumbent LEC’s serving wire center.” 15 F.C.C. Rcd. at 3912, ¶ 486 (emphasis added). Far more generous to CLECs than those required by the UNE Remand Order and/or in any FCC 271 Order.

Pricing. When a CLEC orders UNEs that are already combined, Ameritech Illinois applies the recurring and non-recurring rates for the relevant UNEs consistent with the ICC’s Orders in Dockets Nos. 96-0486/96-0569 and , 98-0555, as reflected in the tariff and ILA. Alexander Aff. ¶ _____. For combinations of UNEs that require new work to assemble, and thus are outside the pricing requirements of sections 251 and 252, Ameritech Illinois applies the recurring and non-recurring rates established in Docket Nos. 96-0486/96-0569 for each of the individual UNEs. Id. ¶ ____.

3. Intellectual Property

Consistent with the FCC’s determinations in the Intellectual Property Order (¶¶ 2, 9)¹¹ Ameritech Illinois has committed to use its best efforts to obtain co-extensive Third Party

¹¹ In re Petition of MCI for Declaratory Ruling that New Entrants Need Not Obtain Separate License or Right-to-use Agreements Before Purchasing Unbundled Elements; Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 96-98 (rel. April 27, 2000); 15 F.C.C. Rcd. 13896 (“Intellectual Property Order”).

Intellectual Property rights that are equal in quality to those Ameritech Illinois obtains for itself, so that CLECs can utilize network elements in the same manner as Ameritech Illinois.

Alexander Aff. ¶ ___. Ameritech Illinois has made this commitment even though the FCC has recognized that “we do not believe that this issue is currently preventing competing carriers from being able to enter the local exchange and exchange access markets.” Intellectual Property Order, ¶ 2.

4. Pricing

Ameritech Illinois provides UNEs to CLECs at rates that comply with FCC and statutory requirements. Each UNE rate currently available – as well as the rates currently available for all required forms of collocation and reciprocal compensation – has been approved by the ICC. In reviewing all of these rates, the ICC has applied in a strict, and we believe conservative, manner the FCC’s TELRIC methodology. Indeed, Ameritech Illinois believes that the currently available rates are, for the most part, significantly lower than those authorized by TELRIC¹³ – and, needless to say, far lower than those the CLECs would be eligible to receive under Section 252(d)(1) of the 1996 Act, as recently interpreted by the Eighth Circuit. See Iowa Utilities Board v. FCC, 219 F.3d 744, 749-51 (8th Cir. 2000).

Subsequent to the passage of the 1996 Act, the ICC has conducted two generic cost dockets to determine the UNE and collocation rates Ameritech Illinois is permitted to charge CLECs under arbitrated interconnection agreements and tariffs mandated by the ICC. The first

¹³ Consistent with this belief, Ameritech Illinois is currently challenging the validity of certain aspects of the ICC orders mandating the rates in question. See _____. Further, the ICC’s Order in Docket No. _____ is now on rehearing before the ICC. Pending completion of these dockets, Ameritech Illinois has complied, and will continue to comply, fully with all aspects of the orders in question that are not the subject of rehearing.

of these, Docket No. 96-0486/96-0569, was commenced in late 1996 and concluded with an order dated February 17, 1998¹⁴. The rates that have resulted from this docket are being reviewed in the TELRIC Compliance Docket No. 98-0396..

The second docket, Docket No. 99-0615, was commenced in the 4th quarter 1999 and resulted in an order dated August 17, 2000. All significant Illinois CLECs actively participated in this docket, including AT&T and MCI WorldCom. The ICC Staff also played a major role in the docket. Florence Aff. ¶¶ ____.

In the initial phase of both generic cost dockets, Ameritech Illinois developed cost studies covering each of the UNEs ordered unbundled by the FCC and the ICC at the time of filing, as well as caged, cageless, adjacent and virtual collocation and reciprocal compensation. These studies complied fully with the FCC's and ICC's TELRIC methodology.¹⁷ Florence Aff.

¶¶ ____.

These rates are now available to CLECs throughout Ameritech Illinois' service areas. They can be incorporated in new interconnection agreements and by amendment in existing interconnection agreements. In addition, the ICC in both Docket No. 96-0486/96-0569 and Docket No. 99-0615 ordered Ameritech Illinois (i) to file tariffs covering each of the products and services that were addressed in the respective docket, and (ii) to insert in these tariffs the rates for each that resulted from that docket. Ameritech Illinois has complied with those orders .

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Accordingly, all of Ameritech Illinois' UNE and collocation rates (and corresponding products) are now available to all Illinois CLECs via tariffs outside the 1996 Act's interconnection agreement process. Florence Aff. ¶¶ ____; Alexander Aff. ¶¶ ____.

Further, Ameritech Illinois has approved rates for "long-term shared" transport in conjunction with unbundled local switching.¹⁸ This product and the associated rates are now available to all Illinois CLECs both through the interconnection agreement process (including via the ILA) and via tariffs Id. ¶ ____ Alexander Aff. ¶ ____.

Finally, the ICC has established rates for line sharing and related products and services.¹⁹ These rates in all cases are lower than those proposed by Ameritech Illinois (whose proposals were in each case derived by applying TELRIC-compliant principles). Florence Aff. ¶¶ ____.

These rates (and the products and services to which they relate) are likewise available to all Illinois CLECs both through the interconnection agreement process and via tariffs. Id. ¶ ____; Alexander Aff. ¶ ____.

5. Non-Discriminatory Access to OSS

The term "operations support systems" ("OSS") refers generally to the "systems, databases, and personnel used by incumbent LECs to provide service to their customers." Kansas & Oklahoma 271 Order, ¶ 104. The three facets of OSS can be described by way of example: When an Ameritech Illinois service representative contacts a customer to sell new

¹⁷ Both FCC and ICC TELRIC methodology require the use of forward-looking costs, rather than historical or embedded costs; and both assume the use of the best available, least cost technology and optimum configuration throughout the network.

¹⁸ These rates are being reviewed in Docket No. 00-0700.

¹⁹ Rates have been established in Docket No. 00-0393 and the docket is presently on rehearing.

services, that representatives can consult information maintained in electronic *databases* about that customer's services, and thus better understand what new services the customer might need or want. If the customer places an order, the service representative can input that order into computer *systems*, which coordinate the activities (electronic and manual) involved in installing service. Ameritech Illinois *personnel* then help provision the order, and are available for subsequent repairs as needed. Ameritech Illinois updates its databases, and bills the customer accordingly.

The FCC requires a Bell Operating Company ("BOC") to provide requesting carriers nondiscriminatory access to its OSS so they can "formulate and place orders for network elements or resale services, . . . install service for their customers, . . . maintain and repair network facilities, and . . . bill customers." Kansas & Oklahoma 271 Order, ¶ 104. "For OSS functions that are analogous to those that a BOC provides to itself, its customers or its affiliates, the nondiscrimination standard requires the BOC to offer requesting carriers access that permits competing carriers to perform these functions in 'substantially the same time and manner' as the BOC." Id. Where there is no retail analog, the BOC must offer access "sufficient to allow an efficient competitor a meaningful opportunity to compete." Id.

The FCC takes a two-step approach to analyzing OSS compliance. The first is to determine whether the BOC has made its OSS available to requesting carriers – that is, whether the BOC "has developed sufficient electronic (for functions that the BOC accesses electronically) and manual interfaces to allow competing carriers equivalent access to all of the necessary OSS functions." Id. ¶ 105. The second step is to find whether the OSS are operationally ready, as a practical matter: i.e., "whether the BOC's OSS is handling current demand and will be able to handle reasonably foreseeable future volumes." Id. "The most

probative evidence that OSS functions are operationally ready is actual commercial usage in the state for which the BOC seeks 271 authorization.” Id. In addition, the FCC may consider “the results of carrier-to-carrier testing, independent third-party testing, and internal testing.” Id.

We follow the FCC’s two-step approach here. In this phase of the proceeding, we describe the electronic and manual interfaces Ameritech Illinois offers for each OSS function, along with the extensive efforts Ameritech Illinois has made to address operational concerns and ensure operational readiness. In a subsequent filing, we will describe the results of commercial performance and of the independent third-party test of OSS that is now underway.

As we describe below, and in the accompanying affidavits of Messrs. Cottrell (OSS), Brown (Local Services and Operations Centers) and Foster (Special Services) and Ms. Kagan (billing), Ameritech Illinois offers requesting carriers a full menu of electronic and manual options to access each of the five OSS functions (pre-ordering, ordering, provisioning, repair and maintenance, and billing) for whatever entry strategy (interconnection, unbundled access, or resale) they choose. In recent months, culminating in the March 2001 implementation of version 4 of the Local Service Ordering Guidelines (“LSOG 4”), Ameritech Illinois has carried out a number of upgrades designed to keep existing OSS options current, to give requesting carriers still more alternatives for OSS access, and to address operational issues raised by requesting carriers. Ameritech Illinois developed these improvements in close cooperation with CLECs and regulatory authorities in collaborative proceedings overseen either by the FCC, the ICC, or other state commissions throughout the Ameritech region (as subsequently incorporated in Illinois and approved by the ICC). They have been codified in a Uniform and Enhanced Plan of Record for OSS, filed with the FCC at the conclusion of the federal collaborative proceedings without any

objection from the participating CLECs, and in a parallel Plan of Record provided to and reviewed by the ICC in Docket No. 00-0592, and they are binding on Ameritech Illinois.

To demonstrate on an ongoing basis the commercial results of these OSS undertakings, Ameritech Illinois – with input from the ICC Staff and numerous requesting carriers in a collaborative proceeding initiated by the ICC – has also implemented a comprehensive array of over 160 performance measurements (divided into several thousand categories such as product, service, and geographic area to facilitate analysis) governed by rigorous standards. Fioretti Aff. ¶¶ _____. These measurements and standards are modeled on, and substantially identical to, the Southwestern Bell performance plans approved by the FCC in its Texas and Kansas & Oklahoma 271 Orders. Fioretti Aff. ¶ _____. The most recent updates to this performance plan were submitted to the ICC for approval by a joint motion of the collaborative participants in Docket No. 01-0120 in February of 2001. Id. ¶ _____. On _____, the ICC (Docket No. _____) approved a system of remedies to enforce the agreed performance measures and standards, taken (with minor modifications) from similar remedy plans the FCC approved in its Texas and Kansas & Oklahoma 271 orders and in its conditions for approval of the SBC/Ameritech merger. See Section III.B infra.

Further, as described in the affidavits of Messrs. Cottrell and Brown, Ameritech Illinois has established several service organizations to assist requesting carriers: a Local Service Center to facilitate ordering, a Local Operations Center to assist in provisioning unbundled network elements and in repair and maintenance activities, and call-in centers for advice and assistance. All of these resources fit under the umbrella of a dedicated account team (described in Mr. Thompson's affidavit) that serves as the requesting carrier's single point of contact for coordinating and resolving questions or problems.

Over and above the extensive efforts it has already made, Ameritech Illinois is committed to continuous upkeep and improvement of OSS access in order to keep abreast of developments in technology and law. To that end, Ameritech Illinois and its affiliates have spent over a year negotiating a uniform Change Management Plan (“CMP”) for all 13 SBC/Ameritech states. Cottrell Aff. ¶ __. The CMP offers requesting carriers multiple opportunities to suggest changes to OSS, to provide input on and receive information about proposed changes, and to test changes before their actual implementation. The 13-state plan is modeled on plans approved by the FCC for Texas, Kansas and Oklahoma, and it has been presented to the FCC in final form (as part of the collaborative proceeding on Uniform and Enhanced OSS) with no disputed issues at the federal level. It was also presented to and approved by the ICC (with some Illinois-specific modifications) in Docket No. 00-0592.

a. Pre-Ordering

Pre-ordering “generally includes those activities that a carrier undertakes to gather and verify the information necessary to place an order.” Kansas & Oklahoma 271 Order, ¶ 120. Ameritech Illinois offers CLECs two main electronic interfaces to access pre-ordering functions, which enable CLECs to access the same information from the same sources that Ameritech Illinois’ retail operations use, and which also give CLECs additional functions not available to retail representatives. Cottrell Aff. ¶¶ _____. Both interfaces respond in “real time” – that is, the CLEC representative can retrieve information while talking with an end user. Id. ¶ ____.

The first pre-order interface is EDI/CORBA, an industry standard gateway that can understand inquiries submitted in either of two languages (EDI and CORBA) promulgated by technical industry bodies. Id. ¶ _____. EDI/CORBA is an “application-to-application” interface: It allows a CLEC’s electronic systems and software applications to communicate with their

counterparts at Ameritech Illinois. Id. A CLEC can thus integrate the interface with its own electronic systems, and with the ordering interface described below. Id. And by using industry standard formats, Ameritech Illinois gives CLECs that operate in more than one region the opportunity to build to a relatively standard interface nationwide, rather than having to learn how to work with the individual systems of different BOCs. Id.

Ameritech Illinois' second pre-order gateway is Enhanced Verigate, which was introduced for commercial use in March 2001 and which is modeled on the Verigate (Verification Gateway) interface used by Southwestern Bell. Id. ¶ __. Enhanced Verigate is a Graphical User Interface: instead of communicating with a CLEC's electronic systems the way an application-to-application interface would, Enhanced Verigate accepts commands from CLEC representatives working on computer screens, just like well-known personal computer programs do. Id. ¶ __. It uses plain-English displays, and is based on the same design that is used for Internet web browsers. Id. This interface is thus suited for carriers (typically, smaller or newer CLECs) that do not have or wish to develop their own electronic systems and applications for pre-ordering. Id. At the same time, it gives CLECs access to the same information that is available through EDI/CORBA. Id. ¶ __. Over 30 CLECs have already made commercial use of this interface. Id. ¶ __.

Both pre-order interfaces allow requesting carriers access to the same information and functions available to Ameritech Illinois' retail representatives (id. ¶ __), and to the same functions identified by the FCC in prior orders under section 271. A requesting carrier can thus verify the customer's address, look up the customer's service record and directory listings, find out what features and services are available to the customer, pick and reserve a telephone number, determine the need for a field dispatch to install service, obtain a due date for

installation, and obtain information (such as the Network Channel Interface) for ordering unbundled access. Id. ¶ _____. What's more, requesting carriers enjoy a feature that is not available to Ameritech Illinois' retail operations: the ability to determine on-line whether the end user's loop will support DSL service (i.e. to obtain information on the loop's characteristics and "qualifications"). Id. ¶ ____.

Integration. As part of its assessment of OSS, the FCC considers whether a BOC allows requesting carriers to successfully integrate pre-ordering information into the ordering process and into the requesting carrier's systems. Texas 271 Order, ¶ 152. "[A] BOC has enabled 'successful integration' if competing carriers may, or have been able to, automatically populate information supplied by the BOC's pre-ordering systems onto an order form . . . that will not be rejected by the BOC's OSS systems." Id. Ameritech Illinois' EDI/CORBA pre-order interface is designed to be integrated with the EDI order gateway described below to form a seamless pre-order/order system, and it can also be integrated with CLEC systems that use either one of the two industry standard formats, EDI and CORBA. Cottrell Aff. ¶ _____. Moreover, at the request of MCI/WorldCom Ameritech Illinois modified EDI/CORBA so that it now provides customer address information in a "parsed" format (divided into individual data fields) that corresponds to (and can thus be used to fill out) the order form. Id. ¶ _____. In addition, Ameritech Illinois has modified its pre-ordering and ordering systems and formats to synchronize line data characteristics of fields common to both interfaces. Id. ¶ _____. These features go above and beyond the Southwestern Bell systems that the FCC reviewed and found compliant in its Texas 271 Order (¶ 153).

Interface Response Times. Among the numerous performance measures developed in the Illinois collaborative and approved by the ICC, Ameritech Illinois has implemented a series of

performance measures and standards to monitor and ensure the timeliness and quality of pre-order access. Fioretti Aff. ¶¶ _____. Two measures compare the time required to respond to each of the various types of pre-order inquiries to fixed “benchmark” intervals: for example, 4.7 seconds for address verification, and 6.6 seconds for customer service records. *Id.* ¶ _____. The benchmarks are the same as those reviewed by the FCC in its Texas 271 Order (¶ 162), which concluded “that performance satisfying these benchmarks would provide competing carriers a meaningful opportunity to compete.” Fioretti Aff. ¶ ____.

Interface Availability. As is the case with almost all electronic systems, Ameritech Illinois’ OSS interfaces require regular downtime so that Ameritech Illinois can perform routine maintenance and upkeep on them. Cottrell Aff. ¶ _____. These maintenance activities are performed overnight and on weekends to minimize the impact on customer service. The scheduled hours for CLECs to access Ameritech Illinois’ pre-order interfaces are posted on the CLEC website and equal the hours offered to Ameritech Illinois’ own retail operations. *Id.* ¶ _____. Ameritech Illinois’ performance measures ensure the interfaces are available as advertised, assessing the time each interface is actually available for use (as compared to scheduled hours of availability), and the advance notice provided of any interface outages. Fioretti Aff. ¶¶ _____.

b. Ordering

As with pre-ordering, Ameritech Illinois offers requesting carriers two alternative interfaces to submit local service requests. The first is an application-to-application interface based on Electronic Data Interchange (“EDI”), which can be used either on a standalone basis or coupled with the EDI/CORBA pre-order interface described above. Cottrell Aff. ¶ _____. In March 2001, Ameritech Illinois updated the EDI interface in accordance with version 4 of the

Local Service Ordering Guidelines (“LSOG 4”), which are promulgated by the industry’s Ordering and Billing Forum. Id. ¶¶ _____. The second order interface is Enhanced Local Exchange (Enhanced LEX), a Graphical User Interface modeled on Southwestern Bell’s LEX system but enhanced so that requesting carriers can access it using a commercial Internet Web browser program. Id. ¶¶ _____. Some carriers submit orders manually (*e.g.* by facsimile) through the Local Service Center. Id. ¶ ____; Brown Aff. ¶ ____.

Upon receiving a local service request, Ameritech Illinois’ order interface and systems check it for format and content. Cottrell Aff. ¶ _____. Requests that are improperly formatted, or that do not contain necessary data, are returned to the requesting carrier electronically with a rejection notice. Id. ¶ _____. Once a properly formatted request passes the edit checks in the ordering interface, Ameritech Illinois provides the requesting carrier a notice confirming the receipt of a firm order. Id. ¶¶ _____. This notice is commonly referred to as a “Firm Order Confirmation” or “FOC.” Id. ¶ _____. The request is then translated from its industry standard format to the internal language used and understood by Ameritech Illinois’ provisioning systems, which coordinate the activities involved in filling the order. Id. ¶¶ _____. When provisioning is complete, Ameritech Illinois sends a notice of completion to the requesting carrier. Id. ¶¶ _____. All of these status notices are unique to the wholesale environment. Id. ¶ _____. They reflect the fact that requesting carriers, unlike retail personnel, access Ameritech Illinois’ systems through standard interfaces. Id.; Fioretti Aff. ¶ _____. Thus, the performance standards for these notices are not based on a direct “parity” test (because there is no direct retail analog) but are designed to afford efficient competitors a meaningful opportunity to compete. Id.

This section describes the steps involved in submitting and processing orders and the related status notices. The activities involved in provisioning are addressed in the next section.

Rejections. Ameritech Illinois reviews carrier orders, whether placed electronically or manually, for completeness, proper content, and format. Cottrell Aff. ¶¶ _____. Orders that are incomplete, inaccurate or improperly formatted are returned to the requesting carrier electronically, along with a notice of rejection that identifies the reasons for rejection so the carrier can correct and resubmit its request. Id. ¶¶ _____. To ensure that CLECs receive prompt notice, Ameritech Illinois has implemented several performance measures that assess the speed at which it issues such notices against fixed benchmarks identical to those approved by the FCC in its Texas 271 Order (¶¶ 174-175). Fioretti Aff. ¶¶ _____. One such benchmark, for example, requires Ameritech Illinois to return 97 percent of electronically submitted, electronically rejected orders within 1 hour of receiving the order. Id. ¶ ____.

While the FCC has properly recognized that “we will not hold a BOC accountable for rejects that occur for reasons within a competing LEC’s control,” (New York 271 Order, ¶ 176)²⁰, Ameritech Illinois offers extensive training and assistance (coupling live instruction with convenient on-line reference and “help” guides) to help competing LECs submit accurate requests and thus avoid rejection in the first place. See Section II.B.5(e) infra. Further, to help requesting carriers avoid errors due to their submission of an order with an invalid end user address, Ameritech Illinois changed its ordering systems in March 2001 so that carriers can now submit most orders without an address, using alternative means to identify the location at which Ameritech Illinois is to install service. Cottrell Aff. ¶ ____.

²⁰ In re Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act to Provide In-Region, Interlata Service in the State of New York, 15 F.C.C. Rcd. 75 (Dec. 27, 1999) (“New York 271 Order”).

Firm Order Confirmations. Once a valid, firm order is accepted for processing, Ameritech Illinois issues a Firm Order Confirmation (“FOC”) to the requesting carrier.

Id. ¶ _____. As with order rejections, Ameritech Illinois has several performance measures and standards designed to ensure that FOCs are returned on a timely basis that affords requesting carriers a meaningful opportunity to compete. Fioretti Aff. ¶ _____. Among other things, these standards require Ameritech Illinois to issue 95 percent of FOCs on electronically submitted orders within 2 hours of receipt if the order is processed without need for manual intervention. Id. ¶ ____.

Jeopardy Notices. Ameritech Illinois takes the affirmative step of issuing electronic “jeopardy” notices to competing carriers if a condition in scheduling might cause Ameritech Illinois to miss the due date for installation. Cottrell Aff. ¶ _____. Ameritech Illinois’ performance measures report the percentage of jeopardy notices issued within 24 hours of the due date, and the overall percentage of orders receiving jeopardy notices. Fioretti Aff. ¶ _____. Note, however, that a jeopardy does not mean that the due date will be missed, only that it might be missed; Ameritech Illinois may still resolve the condition that caused the jeopardy without any delay in installation. Id. ¶ _____. Thus, the FCC finds the rate of actual missed due dates (which we discuss under provisioning, below) more probative in assessing checklist compliance. Texas 271 Order, ¶ 185.²¹

Completion Notices. Ameritech Illinois issues electronic notices of order completion to the requesting carrier once the physical work of installing service is complete and the order is

²¹ In re Application by SBC Communications Inc. et al. Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region, InterLATA Services in Texas, 15 F.C.C. Rcd. 18,354 (June 30, 2000) (“Texas 271 Order”).

registered as complete in Ameritech Illinois' ordering and provisioning systems. Cottrell Aff.

¶¶ _____. In the event the CLEC's order results in the loss of a customer by a different CLEC, Ameritech Illinois also issues a "loss notification" to the losing carrier. Id. ¶ _____. Ameritech Illinois' performance standards require it to issue 97 percent of completion notices within 1 hour of the time the order is registered as complete in Ameritech Illinois' OSS, and the same percentage within 1 day of the completion of physical work. Fioretti Aff. ¶¶ _____. The FCC approved identical standards in its Texas 271 Order (¶ 188) and its SBC/Ameritech Merger Order (Attach. A-2a, measure no. 4d).²²

Status inquiries. In addition to the automatic notices described above, Ameritech Illinois offers CLECs several ways to check on the status of an order at any point in time. Requesting carriers may obtain information either as to Order Status (which depicts the processing of the order, *e.g.* whether it has been confirmed and whether it has flowed into the downstream systems) and as to Provisioning Order Status (which depicts the activities involved in filling the order, *e.g.* whether field work is necessary, whether a technician has been assigned, or whether field work is complete). Cottrell Aff. ¶¶ _____. Status information is available on-line to CLECs using either pre-order interface. Id. ¶¶ _____. It is available on a region-wide basis; thus, a CLEC can obtain status information for orders in more than one Ameritech state at a time. Id. ¶ _____. (By contrast, retail representatives can only obtain status information for a single state at one sitting. Id.)

²² Memorandum Opinion and Order, Applications of Ameritech Corp., Transferor, and SBC Communications Inc., Transferee, For Consent to Transfer Control, 14 F.C.C. Rcd. 14712 (1999), vacated in part on other grounds sub nom. Association of Communications Enters. v. FCC, 235 F.3d 662 (D.C. Cir. 2001) ("ASCENT").

Flow-through. As described above, CLECs may access Ameritech Illinois' OSS electronically via interfaces that use standard formats. Once a properly formatted request passes the edit checks described above, the next step is to translate it from the standardized format to the internal service order format used by Ameritech Illinois' downstream systems. Cottrell Aff.

¶ _____. For some order types, the interface is designed to translate the entire request electronically and send it downstream for processing; these orders are said to "flow through."

Id. ¶ _____. For other order types, a complete electronic translation has not yet been developed (due to the complexity of the order or to the recent introduction or modification of the related product, among other reasons). Id. In those cases, the carrier's request is sent to the Local Service Center, where an Ameritech Illinois representative types it directly into the downstream systems. Id.; Brown Aff. ¶ _____. (This is the same method Ameritech Illinois uses to enter its own retail orders.)

Given that flow through refers to only one step in the overall ordering process (the translation of orders from the format in which CLECs submit them to the format in which Ameritech Illinois processes them), the FCC has recognized that flow-through data "are not so much an end in themselves, but rather are a tool used to indicate a wide range of possible deficiencies in a BOC's OSS." New York 271 Order, ¶ 162. Thus, a BOC's "overall ability to return timely order confirmation and rejection notices, accurately process manually handled orders, and scale its systems is more relevant and probative for analyzing [its] ability to provide access to its ordering functions than a simple flow-through analysis." Id. ¶ 163.

Ameritech Illinois has undertaken a series of steps to improve flow-through while keeping it in perspective as a means to an end (improved overall performance) rather than an end in itself. In December 2000, for example, Ameritech Illinois implemented system enhancements

designed to improve flow-through for DSL and Line Sharing orders. Cottrell Aff. ¶ _____. To facilitate and prioritize continued enhancements, Ameritech Illinois (working with CLEC participants in the various collaborative proceedings throughout the region) has instituted a cooperative process for identifying future flow-through needs. Id. ¶ _____. Pursuant to that procedure, which was approved by and is embodied in the ICC's January 24, 2001 Order in Docket No. 00-0592, Ameritech Illinois has provided CLECs an updated list of orders that are not currently designed to flow through. Id. The CLECs will then give Ameritech Illinois a prioritized list of order types that they prefer to have flowed through, which will form the basis of a detailed project plan outlining the nature and timetable for future enhancements. Id. Ameritech Illinois has agreed to furnish quarterly progress reports to the ICC on these priority items. Id.

Ameritech Illinois has also taken steps to ensure the timely and accurate processing of orders that do not flow through. These orders are input at the regional level, by service representatives in Local Service Centers in Southfield and Grand Rapids, Michigan; Milwaukee, Wisconsin; and Indianapolis, Indiana. Brown Aff. ¶ _____. Orders are assigned to specialized work groups that focus on particular order types (*e.g.* unbundled loop orders). Id. ¶¶ _____. In all, the Local Service Centers have over 900 service representatives. Id. ¶ _____. Each CLEC has its own point of contact at the LSC, and can escalate concerns all the way up to the Vice President of Interconnection Services. Id. ¶ _____.

The assignment function for order input is coordinated by a single electronic system, known as Mechanized Order Receipt/Telemanagement ("MOR/Tel"), which is designed to assign orders on a first-come first-served basis. Id. ¶ _____. MOR/Tel not only assigns orders, but

also prepares a partial order form using information from the CLEC's request to minimize the amount of manual work (and time) required to finish inputting the order.

c. Provisioning

Ameritech Illinois is subject to a panoply of performance standards designed to ensure its continued timely and accurate provisioning of carrier orders. First, in accordance with the Michigan 271 Order (¶¶ 166 , 212), Ameritech Illinois measures the average installation intervals for resale, unbundled loops and other unbundled network events, and interconnection. Fioretti Aff. ¶¶ _____. Consistent with the FCC's view that "Ameritech can and should disaggregate its data to account for the impact different types of services may have on the average installation interval" (Michigan 271 Order, ¶ 170), Ameritech Illinois reports intervals separately based on product type, customer (business or residential), geographic area, and by whether completing the order requires dispatch of a field technician. Fioretti Aff. ¶ _____. Ameritech Illinois also measures the percentage of installations completed within benchmark intervals (the same as those approved in the Texas 271 Order), the percentage completed by the due date, and the average delay for orders not completed by the due date (the "held order" measurement that the FCC directed section 271 applicants to report in its Michigan 271 Order, ¶ 212). Fioretti Aff. ¶¶ _____. To address provisioning accuracy (Michigan 271 Order, ¶ 212), Ameritech Illinois measures the rate of installations for which "trouble" is reported within 30 days of installation, and it also compares the features on mechanized orders to the features installed and recorded in the customer database. Fioretti Aff. ¶¶ _____.

d. Repair and Maintenance

As with the other OSS functions, Ameritech Illinois offers two alternative methods by which a requesting carrier may report trouble and request maintenance: (1) Electronic Bonding

& Trouble Administration (“EBTA”), an industry standard application-to-application interface method, and (2) a Graphical User Interface known as EBTA GUI. Cottrell Aff. ¶¶ ____.

CLECs may also contact Ameritech Illinois’ Local Operations Center (which is responsible for maintenance issues). *Id.* ¶ _____. The service representative will then access Ameritech Illinois’ electronic systems. Brown Aff. ¶ ____.

EBTA GUI allows carriers to perform the same functions that Ameritech Illinois’ retail operations perform. *Id.* ¶¶ _____. Among other things, requesting carriers can (1) issue trouble reports, (2) conduct a mechanized loop test, (3) determine the status of a previous trouble report, (4) view a list of open trouble reports, and (5) view a list of reports closed within the last 120 days. *Id.* ¶ _____. The alternative interface, EBTA, enables carriers to perform all but the last two functions (*id.*); however, as the FCC found in the Texas 271 Order (¶ 203 n.565), “a BOC is not required, for the purpose of satisfying checklist item 2, to implement an application-to-application interface for maintenance and repair functions – provided it demonstrates that it provides equivalent access . . . in another manner” as Ameritech Illinois does via EBTA GUI.

e. Billing

Ameritech Illinois uses a single, integrated regional system to process usage data for retail, resale, and UNE-P customers. Kagan Aff. ¶ _____. That system provides Daily Usage Files, extracted from the usage processing system, to CLECs for use in billing their end users and other carriers. *Id.* ¶ _____. CLECs can choose to receive the file via magnetic tape or electronically over data lines in the industry – standard format. *Id.* ¶ _____. Ameritech Illinois’ performance standards (PM 19) require it to issue 95 percent of usage files within 6 days (Fioretti Aff. ¶¶ ____), a standard that is identical to the one the FCC has previously approved as an “appropriate measure of SWBT’s [Southwestern Bell’s] ability to provide competing carriers with usage data in

substantially the same time and manner that SWBT provides such information to itself.” Texas 271 Order, ¶ 211. Ameritech Illinois’ performance standards (PM 16) also require that 95 percent of usage files be transmitted correctly, that is, in a complete and correctly formatted file. Fioretti Aff. ¶ ____.

Ameritech Illinois also issues monthly bills to carriers. Its performance standards (PM 18) require it to issue 95 percent of wholesale bills within the sixth business day after the bill cutoff date. Fioretti Aff. ¶ _____. Monthly bills are subject to the quality control and testing procedures that go beyond those used for retail bills. Kagan Aff. ¶ _____. On each billing date (there are ten billing cycles each month) Ameritech Illinois representatives review bills for completeness and format. Id. Monthly, Ameritech Illinois tests a sample of items to ensure that the rates for each product or service have been properly applied. Id. Ameritech Illinois’ performance measurement plan sets a standard of nondiscrimination between monthly test results for wholesale and retail bills. Fioretti Aff. ¶ _____. These performance measurements meet the FCC’s request, in its Michigan 271 Order (¶ 212), for measures of bill quality and accuracy.

Ameritech Illinois’ electronic systems also subject retail and wholesale orders to a number of edit checks at the billing stage, to help ensure bill accuracy. Kagan Aff. ¶¶ _____. The Local Service Centers have devoted a special Error Corrections team to resolve errors identified in the billing process, so that orders are posted before the billing cut-off (thus preventing double-billing, the concern expressed in the Michigan 271 Order, ¶¶ 200-203). Brown Aff. ¶ _____. Team members review summaries of pending orders daily to identify priorities and ensure timely resolution. Id. Ameritech Illinois backs these commitments with its performance measurement plan, which requires nondiscrimination between wholesale and retail, both in the average time to

clear service orders in the billing process, and in the percentage of service orders that post within the billing cycle. Fioretti Aff. ¶¶ ____.

f. Training, Carrier Assistance, and Help Desk Support

At the same time that it has increased the quantity and quality of electronic methods to access OSS, Ameritech Illinois has given equal attention to the human side of OSS access, all the way from the CLEC's initial start-up to its mature operation. Ameritech Illinois dedicates a separate Account Manager to each CLEC to serve as its principal contact with Ameritech Illinois and as a guide to the various services and options available to that CLEC. Ameritech Illinois offers a wide selection of training courses, totaling 30 days in education, that cover a variety of business and technical subjects associated with OSS use. These courses are supplemented by an interactive CLEC website, along with specialized groups that offer technical assistance. Region-wide service centers staffed by hundreds of trained specialists handle manual provisioning and maintenance activities for individual orders or trouble reports, while expert support teams handle global questions about OSS access as they arise. For all areas of OSS, Ameritech Illinois has instituted a CLEC User Forum that enables CLECs to meet as a group to exchange ideas with each other and provide input to Ameritech Illinois.

Account Management. Every CLEC is assigned an Account Manager who is responsible for all activities pertaining to that CLEC's working relationship with Ameritech Illinois for local service. Thompson Aff. ¶ __. The Account Manager's work begins at the very inception of that relationship, with start-up activities related to carrying out the parties' interconnection agreement that involve gathering information about the CLEC's business needs and forecast demand while giving the CLEC information about Ameritech Illinois services and practical nuts-and-bolts information like OSS passwords. Id. ¶¶ ____.

serves both as a liaison and advocate on the CLEC's behalf, to (1) receive CLEC questions, concerns and problems, (2) forward them to the appropriate persons within Ameritech Illinois, (3) keep the CLEC apprised of status, and (4) provide the response to the CLEC. Id. ¶¶ ____.

The Account Manager also serves as a guide and reference to coordinate the CLEC's use of other support resources described below.

The training, guidelines, and responsibilities for Account Managers have been revised (effective in the fourth quarter of 2000) to reflect CLEC input and Ameritech Illinois commitments during the course of collaborative proceedings in Wisconsin. Among other things, the enhanced guidelines state that the Account Manager is to return pages within 1 hour received (if paged during business hours), and to return CLEC telephone calls and correspondence within 8 business hours. Id. ¶ ____.

Further, at the request of CLECs, Ameritech Illinois has given Account Managers additional authority within the organization (id. ¶ ____), and has provided CLECs with information and procedures to escalate issues to higher levels if necessary (id. ¶ ____).

Training. Ameritech Illinois offers CLECs extensive training in using OSS, with 19 workshops (totaling 25 days of in-class time) that cover the basics of local service, each of the three entry methods (resale, unbundled access, and interconnection), and specific products and services (including the UNE platform, EELs, dark fiber, and broadband service). Thompson Aff. ¶¶ ____.

In addition, Ameritech Illinois offers five one-day classes on OSS, each covering a different one of the interfaces described above. Cottrell Aff. ¶¶ ____.

These workshops and classes feature small class sizes (with a maximum of ten students per class) to assure hands-on instruction, along with in-class exercises. Thompson Aff. ¶ ____.

CLEC representatives attending these classes receive complimentary take-home materials, including paper and electronic copies

of the instructor and student guides, to help them pass their knowledge on to others within their company. Id. ¶ __; Cottrell Aff. ¶ ____.

Technical Assistance. Technical assistance is available to CLECs at every stage of their development and deployment of access to Ameritech Illinois' OSS. An OSS Customer Support team, consisting of experts in software applications and information services, conducts regular demonstrations of OSS, and helps the CLEC set up OSS access through technical one-on-one meetings to discuss hardware and software requirements, training needs, and implementation strategies. Cottrell Aff. ¶¶ _____. This team is available throughout the set-up process to answer questions and address any problems that might arise. Id. ¶¶ ____.

Once a CLEC is up and running, Ameritech Illinois makes a wealth of resources available to provide OSS assistance in the CLEC's day-to-day operations. The Local Service Center ("LSC") and Local Operations Center ("LOC") address questions related to individual orders or maintenance requests. The LSC, staffed by over 900 service representatives organized by the product or service type in which they specialize, provides pre-ordering, ordering and billing services weekdays, from 7:00 a.m. to 5:00 p.m. Central time. Brown Aff. ¶¶ _____. The LOC, with over 500 trained technicians on staff, is available 24 hours a day, seven days a week to address provisioning and maintenance issues. Id. ¶¶ _____. These centers represent an annual investment of over \$__ million by Ameritech Illinois. Id. ¶ ____.

At a more global level, the Information Services ("IS") Call Center is available 24 hours a day, 7 days a week for technical issues associated with hardware and software. Id. ¶ _____. It maintains an electronic record of calls to track their resolution and identify any trends. Id. ¶ _____. Meanwhile, the Mechanized Customer Production Support Center ("MCP Support Center"), available Monday through Friday from 7:00 a.m. until 7:00 p.m. Central, handles practical

questions associated with ordering, such as formats and product codes, and assists CLECs in analyzing (and thus preventing) order errors. Id. ¶¶ ____

Interactive CLEC Website. Ameritech Illinois' previous CLEC web site, TCNet, was integrated with the existing SBC CLEC web site in September 2000 to create an enhanced, interactive web site (located at <<https://clec.sbc.com>>), which supports CLECs in all SBC operating regions. Cottrell Aff. ¶ _____. It includes the following resources, all coordinated by an online menu (id.):

- A CLEC Handbook and reference guide, which describes procedures and business rules and includes ordering codes such as Uniform Service Ordering Codes ("USOCs") and Field Identifiers ("FIDs") (see also Thompson Aff. ¶ ____);
- Descriptions and availability of training programs (id.);
- An IS Call Center site, which provides information on system status (i.e., if any systems are unavailable for any reason) and troubleshooting advice for common OSS questions;
- Copies of Accessible Letters, which are used to notify CLECs of upcoming OSS changes; and
- Monthly performance reports showing CLEC-specific results in each of the performance measurements and categories covered by Ameritech Illinois' ICC-approved performance plan.

These online resources provide an electronic complement to the support groups described above.

CLEC User Forum. As discussed above, many of the resources available to CLECs have been enhanced to reflect CLEC input in ICC-supervised collaboratives. To ensure continued CLEC participation in these efforts, Ameritech Illinois and its affiliates throughout the Ameritech region have instituted a CLEC User Forum, with representatives from CLECs and Ameritech Illinois, which meets once a month to discuss issues that participants deem critical to

their business needs. Thompson Aff. ¶ ___. An executive steering committee meets by conference call twice each month. Id. Notice of Forum meetings and conference calls is distributed via Accessible Letter to CLECs in Ameritech's five-state area. Id. ¶ ___.

g. Change Management Plan

“Change management” refers to “the methods and procedures that the BOC employs to communicate with competing carriers regarding the performance of and changes in the BOC’s OSS system.” New York 271 Order, ¶ 110. Periodic changes to OSS “may include operations updates to existing functions that impact competing carrier interface(s) upon a BOC's release of new interface software; technology changes that require competing carriers to meet new technical requirements upon a BOC's software release date; additional functionality changes that may be used at the competing carrier's option, on or after a BOC's release date for new interface software; and changes that may be mandated by regulatory authorities.” Id. The FCC has identified the following elements of a change management plan that give an efficient competitor a meaningful opportunity to compete (id. ¶ 111):

- (1) evidence of competing carrier input in the design and continued operation of the change management process;
- (2) the memorialization of the change management process in a basic document;
- (3) the availability of a separate forum for change management disputes;
- (4) and the availability of a stable testing environment that mirrors production

Ameritech Illinois’ change management plan is modeled on plans approved by the FCC for Texas, Kansas and Oklahoma, and reflects further input from CLECs and state commissions throughout the Southwestern Bell and Ameritech regions. As we show below it comprises all four of the elements of a successful plan. Moreover, Ameritech Illinois’ plan gives requesting

carriers an extra layer of protection by means of “versioning,” which allows carriers to continue using previous OSS software while making the transition to the latest version.

Competing Carrier Input. Ameritech Illinois’ change management plan (“CMP”) reflects 13 months of negotiations with CLECs throughout the 13-State SBC/Ameritech service area, conducted pursuant to the FCC’s merger conditions. Cottrell Aff. ¶ _____. It was submitted to the FCC at the conclusion of the Uniform and Enhanced OSS collaborative. Id. No CLEC disputed or sought to arbitrate any provision of the CMP at the federal level. It was also approved by the ICC (with some Illinois-specific modifications) in Docket No. 00-0592.

The 13-state CMP provides milestones and a timeline for the change or “release” process for both application-to-application interfaces and GUIs. Id. ¶ _____. It includes multiple avenues for CLEC input on an ongoing basis throughout the change process, starting with periodic Change Management Meetings between CLEC and Ameritech Illinois personnel (id.), where CLECs can suggest and discuss improvements to OSS they deem useful. CLECs can also submit suggested changes outside the meeting. Id. ¶ _____. CLEC participation continues during the development and implementation of an OSS change, which typically includes the following procedures (id. ¶ ____):

- A “12-month view” that summarizes OSS changes for the coming year, and is updated each quarter;
- Release Announcements, in which Ameritech Illinois describes each individual proposed change at a high level;
- Initial Requirements, describing the proposed change in detail;
- Walk-through discussions between the parties’ technical experts to discuss the Initial Requirements, followed by a CLEC comment period,
- Final Requirements, describing changes (if any) that result from the walk-through and comment phases;

- CLEC joint testing (described in more detail below); and
- Implementation.

Memorialization in Written Document. The 13-state CMP has been codified in a comprehensive document that was filed in the FCC Uniform and Enhanced OSS collaborative, is included in the Plan of Record reviewed by the ICC (Docket No. 00-0592), and is posted on the CLEC web site. Cottrell Aff. ¶ _____. It contains detailed timelines and procedures for changes, tailored to the type of interface involved (for example, application-to-application interfaces require CLECs to build and update their own systems to mesh with the interface, so the timeframe for changes to such interfaces is longer than for GUIs). Id. ¶¶ _____. Ameritech Illinois' compliance with those timelines is enforced by Performance Measure MI-15. Fioretti Aff. ¶¶ _____.

Dispute Resolution Procedures. As described above, Ameritech Illinois' change management plan itself reflects CLEC input, and it provides for continuing CLEC input and testing on future OSS changes. This gives CLECs the means to both discover and voice any legitimate concerns with a proposed OSS change. To the extent such concerns are not resolved in the walk-through, comment, and testing phases, the CMP contains its own mechanism for dispute resolution. Id. ¶¶ _____. This Outstanding Issue Solution procedure allows a CLEC or CLECs to call for a discussion and vote – by CLECs alone (Ameritech Illinois does not have a vote) – of the issue raised. Id. ¶¶ _____. If a quorum (at most 8 CLECs) is present, and if a majority of that quorum votes against the proposed OSS release, they can delay, modify or even

block the release.²³ This “go-no go” vote is substantially identical to the procedure the FCC endorsed in its Texas 271 Order (§§ 11, 116).

Testing Environment. Joint testing describes the process by which Ameritech Illinois and CLECs test proposed OSS changes before they go into “production” – that is, before they are implemented for commercial use. In January 2001, Ameritech Illinois implemented a new test environment (a set of programs designed to process transactions, such as orders, the same way the real-world OSS will process them when the proposed change is implemented) for testing the March 2001 OSS enhancements and future OSS changes. The test environment is also available between OSS changes, to help CLECs that are just starting out on an interface or that wish to conduct testing for any other purpose. Cottrell Aff. §§ ____.

The test environment is modeled on the one approved by the FCC in its Texas (§ 134) and Kansas & Oklahoma (§ 168) orders. Ameritech Illinois’ test environment adequately mirrors the production OSS, and it is stable: in other words, Ameritech Illinois cannot change it after the testing period commences. Cottrell Aff. § _____. Ameritech Illinois is willing to work with CLECs to develop and evaluate the results of test plans, and it monitors test transactions so that it can more quickly resolve any questions or concerns that arise from them – a feature the FCC found “benefits competing carriers” (Texas 271 Order, § 138). Cottrell Aff. §§ _____. Further, Ameritech Illinois offers “the extended testing periods that competing carriers need for EDI implementation and new release testing.” Kansas & Oklahoma 271 Order, § 168. Competing

²³ The quorum requirement is designed to ensure meaningful participation and discussion by a cross-section of CLECs before a vote is taken, and to prevent a single CLEC from arbitrarily blocking a change that benefits CLECs as a whole. CLECs agreed to a quorum (which has been relaxed from the quorum rule contained in the FCC-approved plans for Texas, Kansas and Oklahoma) at the 13-state level. For Illinois-specific changes, no quorum is required per the ICC’s _____ order on rehearing in Docket No. 00-0592.

carriers receive 60 days to test OSS releases described in the Uniform and Enhanced Plan of Record, and 30 days for other (typically less significant) changes.

Versioning. Versioning is a feature that allows requesting carriers to continue using an existing version of OSS software even after Ameritech Illinois issues a new version. Cottrell Aff. ¶ _____. The FCC has found “that versioning enhances [a BOC’s] change management plan by providing significant additional assurance that changes will not disrupt competing carriers’ use of [the BOC’s] OSS.” Kansas & Oklahoma 271 Order, ¶ 167. Ameritech Illinois implemented versioning for ordering and pre-ordering in March 2001. Its capacity for versioning is second to none: Ameritech Illinois allows requesting carriers to use the *two* preceding versions after a new version is implemented, not just the immediately preceding version. Id. ¶ ____.

C. Checklist Item 3: Poles, Ducts, Conduits, and Rights-of-Way

Ameritech Illinois satisfies Checklist Item 3, which requires a BOC to provide “[n]ondiscriminatory access to the poles, ducts, conduits, and rights-of-way owned or controlled by the [BOC] at just and reasonable rates in accordance with the requirements of section 224.” 47 U.S.C. § 271(c)(2)(B)(iii). Ameritech Illinois has a long history of providing access to its poles, ducts and rights-of-way. Ameritech Illinois has been providing such access at least since the adoption of the Pole Attachment Act (47 U.S.C. § 224) in 1978. Stanek Aff. ¶ ____.

1. Agreements

Ameritech Illinois’ Appendix ROW, which has been incorporated into interconnection agreements approved by the ICC, establishes detailed rates, terms, and conditions for access to poles, ducts, conduits, and rights-of-way. Id. ¶ _____. The Appendix ROW reflects the input of numerous telecommunications carriers and is the product of interconnection negotiations and

arbitrations with CLECs pursuant to sections 251 and 252 of the Act. Stanek Aff. ¶ ___. The Appendix ROW is consistent with Section 224 of the Act and the FCC's First Report and Order. Id. ¶ ___.

The Appendix ROW is available to any CLEC. Stanek Aff. ¶ 7. CLECs that have recently included the Appendix ROW in their interconnection agreements with Ameritech Illinois include American Fiber Network, Inc. and NationNet Communications Corporation. Stanek Aff. ¶ ___. In addition, Ameritech Illinois will negotiate modifications or additions to the Appendix ROW, upon request. Id. ¶ ___. Detailed operational information is further defined in "Guidelines for Access to Ameritech Structure." Id.

2. Rates

Currently, Ameritech Illinois' attachment rates for use by telecommunications carriers in Illinois are \$2.36 per pole attachment per year, and \$0.41 per foot of innerduct per year. Stanek Aff. ¶ ___. In his affidavit, _____ addresses the cost study methodology used by Ameritech Illinois when establishing these rates. The First Report and Order does not address charges for access to rights-of-way. Moreover, in its recent Pole Attachment Telecommunications Rate Order,²⁴ the FCC declined to adopt detailed standards that would govern all rights-of-way situations. Instead, the FCC stated that it would address complaints about rates for attachments on a case-by-case basis. Ameritech Illinois does not charge for access to rights-of-way owned or controlled by Ameritech Illinois when access to such rights-of-way is provided in connection with access to an Ameritech Illinois structure, such as a pole or conduit. Stanek Aff. ¶ ___.

²⁴ Implementation of Section 703(e) of the Telecommunications Act of 1996, Amendment of the Commission's Rules and Policies Governing Pole Attachments, Report and Order, 13 F.C.C. Rcd. 6777, 6832, ¶ 121(1998).

Charges for access to other Ameritech Illinois rights-of-way are determined on a case-by-case basis, taking into account the size of the area to be used by the CLEC and the number of existing users of Ameritech Illinois' easement and other relevant factors. Id.

3. Nondiscriminatory Treatment

Ameritech Illinois affords nondiscriminatory treatment to all CLECs requesting to attach to Ameritech Illinois' structure. This concept of nondiscrimination is present throughout the structure access process:

- Ameritech Illinois provides for access to records, which includes maps and engineering records relating to Ameritech Illinois' poles, ducts, conduits, and rights-of-way. Stanek ¶ __. The records provided are the same working records, at the same locations, that Ameritech Illinois engineering personnel use to design their own construction projects, and access is available weeks or months in advance of an application for structure space. Id.
- Ameritech Illinois evaluates CLECs' requests for access to poles, ducts, conduits, and rights-of-way by using the same capacity, safety, reliability, and engineering standards that apply to Ameritech Illinois' own use of those facilities. Id. ¶ __. Consistent with both the FCC's First Report and Order and its Pole Attachment Complaint Procedures, the Appendix ROW permits Ameritech Illinois to deny access only on these grounds and requires Ameritech Illinois, in the event of an access denial, to provide the party seeking access a written denial statement which meets the FCC's requirements. Id.; 47 C.F.R. 1.1403(b); First Report and Order, ¶ 1224.
- The First Report and Order, ¶ 1170, does not permit an incumbent LEC to favor its future business needs over a competitor's current needs by reserving space on or in its own facilities. Therefore, to ensure that all available space is fairly allocated among all users, the Appendix ROW incorporates a nondiscriminatory means by which cable operators and telecommunications carriers, including Ameritech Illinois, may be assigned pole attachment or conduit occupancy space. Stanek Aff. ¶ __.
- In general, Ameritech Illinois is responsible for make-ready work and the requesting carrier pays for that work. Stanek ¶ __. Make-ready work will be performed within the same time intervals which would apply if Ameritech Illinois were performing the work for itself. Id.
- At the requesting carrier's request and expense, Ameritech Illinois will modify its poles or conduit system to accommodate the requesting carrier's facilities consistent with the same capacity, safety, reliability, and engineering considerations that Ameritech Illinois

would apply to itself if the work were performed for Ameritech Illinois' own benefit. Stanek Aff. ¶ ___. In addition, capacity expansions will be performed within the same time intervals which would apply if Ameritech Illinois were performing the work for itself. Id.

4. Modifications to Structure

The Pole Attachments Act and the FCC's Pole Attachment Complaint Procedures require utilities to provide advance written notice to attaching cable system operators and telecommunications carriers before modifying or altering poles, ducts, conduits, and rights-of-way. 47 U.S.C. § 224(h); 47 C.F.R. 1.1403(c). The First Report and Order, ¶ 1209, states that absent a private agreement establishing different notification procedures, written notification of a modification must be provided to attaching parties at least 60 days before commencement of the modification. This notice requirement is incorporated in the Appendix ROW in Section 2.5. Stanek Aff. ¶ ___.

The Pole Attachments Act also establishes a statutory "cost-causer pays" principle with respect to the rearrangement or replacement of attachments required as the result of an additional attachment or the modification of an existing attachment sought by any other entity, including the owner of the pole, duct, conduit, or right-of-way. 47 U.S.C. § 224(i); Stanek Aff. ¶ ___. The First Report and Order similarly requires that the parties benefiting from the modification assume the costs of the modification and that if more than one party benefits, each such party must bear its proportionate share of the costs. In general, the party initiating the request will be the party benefiting. First Report and Order, ¶ 1211. The Appendix ROW both incorporates these principles in Section 2.7. Stanek Aff. ¶ ___.

The First Report and Order also provides that parties who pay for modifications may be entitled to obtain reimbursement from other parties (including the owner of the pole or conduit

facility in question) who later use additional capacity created by the modification. First Report and Order, ¶ 1214. This reimbursement provision is incorporated in Section 2.7 of the Appendix ROW. Stanek Aff. ¶ ____.

5. Performance

Two performance measurements – Percent of Requests Processed Within 35 Days (PM #105) and Average Days Required To Process a Request (PM #106) – are designed to help enforce Ameritech Illinois’ commitment to timely responses to applications for access. Stanek Aff. ¶ ____.

D. Checklist Item 4: Unbundled Local Loops

1. Nondiscriminatory Access to Stand-Alone Loops

a. Unbundled Loops

Ameritech Illinois’ loop offerings include 2-wire analog loops with no more than 8 dB loss , 4-wire analog loops, 2-wire and 4-wire ISDN digital-grade lines, and various 2- and 4-wire loops capable of offering xDSL services. Deere Aff. ¶ _____. The local loop includes, but is not limited to DS1, DS3, fiber, and other high capacity loops to the extent required by applicable law. 47 C.F.R. § 51.319(a); Deere Aff. ¶ _____. There are separate performance standards tailored to each loop product. Fioretti Aff. ¶ _____. For the small percentage of customers served by integrated digital loop carrier (“IDLC”) equipment, Ameritech Illinois provides unbundled loops through alternative facilities. Deere Aff. ¶¶ _____. By agreement during the collaborative process, Ameritech Illinois has committed to notify the requesting carrier of the IDLC issue within 24 hours of order confirmation. Id. ¶ ____.

b. The NID and Subloop Unbundling

Ameritech Illinois provides the ability to obtain and use the NID under terms and conditions established in Ameritech Illinois' interconnection agreements. Deere Aff. ¶¶ _____. CLECs may connect to the customer's inside wire at Ameritech Illinois' NID at no charge, or they may pay Ameritech Illinois to perform any NID repairs, upgrades, disconnects, or rearrangements they desire. Id. ¶ _____. Ameritech Illinois also provides and connects the NID at no additional charge when CLECs order an unbundled loop. Id. ¶¶ _____. CLECs can provide their own NID when serving multiple dwelling units ("MDUs"), and connect directly with the end user's premises wire, or the CLEC can connect to the end user's premises wire via Ameritech Illinois' NID when necessary. Id. ¶ _____.

CLECs also can order sub-elements of the local loop from Ameritech Illinois on an unbundled basis and access these sub-elements at technically feasible accessible points. Deere Aff. ¶¶ _____. Available sub-elements include 2-wire and 4-wire analog subloops (for voice or DSL service), 4-wire DS1 and DS-3 subloops, and a 2-wire ISDN subloop, id. ¶ _____, as well as loop distribution facilities (the segment of a loop between a remote terminal and an end user's NID or other point of demarcation), id. ¶ _____; a high-capacity segment between a Central Office and Remote Terminal, id. ¶ _____; dark fiber, id. ¶¶ _____; and the digital loop carrier, id. ¶¶ _____. These offerings satisfy the FCC's subloop unbundling requirements. See UNE Remand Order, 15 F.C.C. Rcd. at 3789-900, ¶¶ 206-229.

c. Facilities Modification.

To give requesting carriers fast confirmation of order receipt, and to conform to industry guidelines for electronic ordering, Ameritech Illinois' FOCs include an estimated installation date based on standard provisioning intervals and workloads. In some cases, Ameritech Illinois

may subsequently find that the facilities needed to fill the order are unavailable and that more time will be needed. Ameritech Illinois has developed a Facilities Modification Policy that is designed both to reduce the number and length of any delays in provisioning, to keep the requesting carrier apprised of the status of its order and to ensure nondiscriminatory treatment of wholesale and retail customers. Deere Aff. ¶¶ _____. The general terms of the Policy are set forth in the August 15, 2000 Order in ICC Docket No. 00-0593 , and are also posted on Ameritech Illinois' CLEC website. Brown Aff. ¶ _____. Pursuant to the Policy, orders that entail routine modifications to existing facilities are generally processed without delay and without any additional charge for the work performed. Deere Aff. ¶¶ _____. For orders that require more complex work, Ameritech Illinois notifies the requesting carrier of the work, time, and additional cost, if any, that would be involved. Id. ¶ _____. The carrier may accept the quote or choose an alternative method (such as resale or the UNE platform) to serve the end user. See Deere Aff. ¶¶ ____; Brown Aff. ¶¶ _____. The Local Service Center has dedicated a special team to coordinate and oversee this process and to serve as a contact point for CLECs. Brown Aff. ¶ ____.

Procedurally, Ameritech Illinois' performance standards require it to give the requesting carrier notice of facilities delays within 24 hours of the initial FOC. Deere Aff. ¶ ____; Fioretti Aff. ¶ _____. Ameritech Illinois has also implemented a series of performance standards that govern the time for detailed quotes of complex modifications, depending on the type of modifications involved. Id..

d. Coordinated and Frame Due Time Conversions ("Hot Cuts")

As in Texas, Kansas, and Oklahoma, Ameritech Illinois offers CLECs a choice between different methods of coordinated conversions – the fully coordinated hot cut ("CHC") process, non-coordinated hot cuts, and the frame due time ("FDT") hot cut process – allowing CLECs to

select the process that best fits their resources and priorities. Brown Aff. ¶¶ _____. These processes were developed with CLEC input in Ameritech regional collaboratives, and include automatic testing and validation of Dial Tone/Automatic Number Identifications. Id. ¶¶ _____. The processes are subject to the same performance standards used in Texas, Kansas, and Oklahoma, including ICC-approved performance standards that limit late or premature coordinated cutovers. Fioretti Aff. ¶¶ _____.

e. Performance

Ameritech Illinois has implemented, pursuant to ICC order and with CLEC approval, a full complement of performance standards to ensure timely and reliable loop provisioning. Fioretti Aff. ¶¶ _____. These include the intervals for loop installation (expressed as an overall average, as the percentage meeting benchmark intervals, and as compared to due dates), for order status notices (such as order confirmation and completion notices), and for loop repairs. Id. ¶¶ _____. Further, Ameritech Illinois measures the rate of reported troubles on loops, both in general (to assess the quality of facilities) and within 30 days of installation (to help determine whether loops are provided in conformance with the order). Id. ¶¶ _____.

2. Nondiscriminatory Access to xDSL-Capable Loops Used for Advanced Services

a. Pre-Ordering Loop Make-Up Information

Loop qualification refers to the process of obtaining information about a loop's characteristics (such as its length) to evaluate whether the loop can support advanced services. The FCC requires BOCs "to provide access to loop qualification information as part of the pre-ordering functionality of OSS." Kansas & Oklahoma 271 Order, ¶ 121. Specifically, the BOC must "provide competitors with access to all of the same detailed information about the loop that

is available to themselves, and in the same time frame, so that a requesting carrier could make an independent judgment at the pre-ordering stage about whether a requested end user loop is capable of supporting the advanced services equipment the requesting carrier intends to install.”

Id.

As with the systems the FCC reviewed and found sufficient in its Kansas & Oklahoma 271 Order, Ameritech Illinois offers various methods for requesting carriers to obtain loop qualification information. First, where such information already resides in Ameritech Illinois’ loop qualification database, requesting carriers can access it using either one of Ameritech Illinois’ two pre-order interfaces, and will obtain automatically the same information that is available to Ameritech Illinois personnel from the same electronic systems. Ameritech Illinois alternatively will provide “archived actual” loop information if it is available for the CLEC’s request. The requesting carrier can either proceed on the basis of the actual or archived actual information or ask Ameritech Illinois to search its manual records. Manual search requests can be submitted via the pre-order interfaces, and are processed by Outside Plant (“OSP”) Engineering, the same group that handles Ameritech Illinois requests. OSP typically responds within three to five business days, by updating the information in the loop qualification database (where it is available for viewing by the CLEC) and, upon request, by returning the results of the look-ups directly by e-mail. Cottrell Aff. ¶¶ ____.

As in the Kansas & Oklahoma 271 Order (¶ 124), requesting carriers can use these methods to obtain useful qualification information about: (1) the composition of the loop (i.e. fiber or copper); (2) the existence, location and type of any electronic or other equipment on the loop, (3) the loop’s length, (4) its wire gauge, and (5) its electrical parameters. Further, the

carrier can learn about the presence of other technologies in the same or adjacent loop binder groups that might disturb advanced services. Cottrell Aff. ¶¶ ____.

CLECs have real-time access to the actual loop make-up information in Ameritech Illinois' electronic systems. CLECs who use Enhanced Verigate and EDI/CORBA may access Ameritech Illinois' Loop Qualification Host database to retrieve archived actual loop makeup data. CLECs also can order a manual look-up of any actual loop make-up information not stored in Ameritech Illinois' electronic databases. This provides all relevant information possessed by Ameritech Illinois about the status of a particular loop, and permits the data CLEC to determine whether it can provide DSL service to a particular end user via either the HFPL UNE or a stand-alone loop. Silver Aff. ¶¶ ____.

Ameritech Illinois provides loop qualification information at two levels, allowing CLECs to choose the degree of detail that best suits their needs. Pre-qualification is an optional screening tool that provides general information about Ameritech Illinois' facilities, allowing the requesting carrier immediately to draw some preliminary conclusions about whether advanced service may be appropriate for a given geographic area or for a particular customer and about the type of xDSL service that could be used. Qualification, meanwhile, involves information about the loop that serves a specific address or working telephone number. Cottrell Aff. ¶¶ ____.

Ameritech Illinois has implemented performance measures to assess the speed and accuracy with which it provides loop qualification information. As described above, Ameritech Illinois measures the speed of each type of pre-order response; those measures include separate categories dedicated solely to loop qualification inquiries. Fioretti Aff. ¶ _____. Further, Ameritech Illinois measures and reports the accuracy of actual loop make-up information provided in response to DSL inquiries. Id.

b. Stand-alone xDSL-Capable Loops

To obtain loops for their advanced services, Illinois CLECs use ordering and provisioning systems and processes that are largely the same as those used to provision ordinary, stand-alone (uncombined) unbundled loops, and that are identical to those used by Ameritech Illinois' data affiliate. Ameritech Illinois engineering personnel process and fill orders without regard to their source.

CLECs can select the precise conditioning they desire and can even pre-order whatever conditioning turns out to be necessary to provision their desired service over a given loop. In accordance with the SBC/Ameritech Merger Order, all necessary conditioning for loops of 12,000 feet or less is performed automatically and without charge. The ICC approved rates for conditioning in Docket No. 00-0393, which are incorporated into tariffs per the ICC's order, in new interconnection agreements at the CLEC's request, and in existing agreements according to their terms.

c. Line Sharing

Ameritech Illinois has implemented line sharing in Illinois in accordance with the requirements set forth in the Line Sharing Order and in ICC orders. Data CLECs and Ameritech Illinois' affiliate, ASI North, have the same opportunity to access the high-frequency portion of the loop unbundled network element ("HFPL UNE") for carrying data traffic. Silver Aff. ¶ ____.

After release of the Line Sharing Order, Ameritech Illinois, in conjunction with other SBC operating companies, conducted a collaborative line sharing trial to identify key aspects of operating in a line-sharing environment. Ameritech Illinois continues to work collaboratively with the CLECs to address additional issues that may arise. Silver Aff. ¶¶ _____. Ameritech

Illinois makes line sharing available via its tariffs and through ICC-ordered tariffs and amendments to its interconnection agreements with CLECs. Silver Aff. ¶¶ ____.

CLECs desiring loop make-up information use the exact same processes and interfaces as for xDSL capable loops. Silver Aff. ¶ ____.²⁵ Orders for the HFPL UNE also are submitted in the manner and through the same interfaces as orders for xDSL-capable loops. Indeed, a request for the HFPL UNE is basically the same as for a stand-alone xDSL capable loop. The minor differences in the fields utilized when ordering the HFPL UNE are due to the unique aspects of line sharing. Unlike a stand-alone xDSL capable loop that does not have an associated telephone number, when a CLEC purchases the HFPL UNE, the CLEC must provide the telephone number of Ameritech Illinois' voice service that occupies the low frequency portion of the loop to be shared. The CLEC also must provide their desired assignment information related to the provision of the splitter. Just as with the stand-alone xDSL capable loop, when requesting the HFPL UNE, the CLEC simply submits a request either manually or electronically through LEX or EDI. Aside from the above-described differences in the request form itself, the process for the HFPL UNE follows the exact same flows as the xDSL-capable loop offering. Silver Aff. ¶¶ ____.

Ameritech Illinois provisions the HFPL UNE to CLECs under terms and conditions in tariffs and negotiated in interconnection agreements. Just as with xDSL-capable loops, Ameritech Illinois offers CLECs HFPL provisioning intervals that are at parity with, or better than, the provisioning intervals available to Ameritech Illinois' advanced services affiliate, regardless of whether conditioning is required. Silver Aff. ¶¶ ____.

²⁵ Ameritech Illinois is in compliance with the UNE Remand Order. That order clarified the definition of OSS to include access to loop qualification information. Prior to the effective date of the UNE Remand Order's loop qualification requirements, Ameritech Illinois already provided non-discriminatory access to loop make-up information. Silver Aff. ¶ ____.

set forth in the Line Sharing Order (§§ 107, 174), and the Texas 271 Order (§§ 44-45), as well as the Eighth Circuit’s decision in Iowa Utils. Bd. v. FCC, 219 F.3d 744, 758 (8th Cir. 2000).

In short, Ameritech Illinois has the necessary pre-ordering, ordering and provisioning processes in place to provide the HFPL UNE to CLECs in a nondiscriminatory manner. The similarities between ordering and provisioning xDSL-capable loops and the HFPL UNE, coupled with the progress made during the cooperative line sharing trial, assures that Ameritech Illinois is in full compliance with the Line Sharing Order and provides the HFPL UNE in a nondiscriminatory manner. These nondiscriminatory processes ensure a level playing field among unaffiliated and affiliated advanced services providers. Silver Aff. §§ ____.

d. Line Splitting

Line “splitting” refers to a situation in which a carrier that provides voice service using the UNE-Platform shares a loop with a data carrier that uses the HFPL. Ameritech Illinois permits CLECs to engage in line splitting in full compliance with the FCC’s rules. Silver Aff. §§ _____. CLECs have the same options available for line splitting in Illinois as they have in Texas, Kansas and Oklahoma, which the FCC has found to be 271 compliant.

In accordance with the FCC’s rules and orders, including the Line Sharing Reconsideration Order,²⁶ Ameritech Illinois supports line splitting where a CLEC purchases separate UNEs (including unbundled loops, unbundled switching, and cross-connects) and combines them with its own splitter (or the splitter of the CLEC’s data partner) in a collocation

²⁶ Third Report and Order On Reconsideration in CC Docket No. 98-147 and Fourth Report and Order on Reconsideration in CC Docket No. 96-98 (Jan. 19, 2001) (“Line Sharing Reconsideration Order”).

arrangement.²⁷ Silver Aff. ¶¶ _____. Specifically, a CLEC may purchase an xDSL-capable loop UNE from Ameritech Illinois and then provide both voice and data service over the loop.

Alternatively, a CLEC may provide voice service while a data partner provides data services. By accommodating line splitting in this manner, Ameritech Illinois' current offering meets all the FCC's requirements. See Texas 271 Order (¶¶ 323-329); Line Sharing Order (¶ 72); Line Sharing Reconsideration Order (¶ 19).

e. Ameritech Illinois' Wholesale Broadband Service Offering

Project Pronto is a network enhancement initiative whereby SBC plans to invest six billion dollars in its network. This massive investment will bring fiber to neighborhoods across most of SBC's 13-state region and dramatically increase the availability of xDSL services to customers who could not be served under the existing network architecture. Specifically, as the FCC has explained, SBC's operating companies (including Ameritech Illinois) will offer Broadband Services on a wholesale basis to affiliated and unaffiliated advanced services providers where Project Pronto DSL equipment is deployed.²⁸ All carriers, including Ameritech Illinois' affiliate, can purchase these wholesale services on the same nondiscriminatory terms, and through use of the same pre-ordering and ordering systems. These new offerings are *in addition* to all of the competitive options already available to CLECs under the law. The ICC

²⁷ The FCC requires incumbent LECs to accommodate line splitting only where a CLEC purchases an entire loop and provides its own splitter. Texas 271 Order, ¶ 325; Line Sharing Reconsideration Order, ¶ 19.

²⁸ Second Memorandum Opinion and Order, Application of Ameritech Corp., Transferor, and SBC Communications Inc., Transferee, For Consent to Transfer Control, 15 F.C.C. Rcd. 17521, 17537, ¶ 30 (2000) ("We take no position on whether SBC's Broadband Offering is subject to section 251-252 or any other provisions of the Act.").

ordered Ameritech Illinois to “unbundle” Project Pronto in Docket No. 00-0393; that order is presently on rehearing.

E. Checklist Item 5: Unbundled Local Transport

Section 271(c)(2)(B)(v) requires Ameritech Illinois to offer “[l]ocal transport from the trunk side of a wireline local exchange carrier switch unbundled from switching or other services.” See also 47 C.F.R. § 51.319(d). Ameritech Illinois provides access to both dedicated interoffice transport and shared interoffice transport consistent with these unbundling requirements. Deere Aff. ¶¶ ____; Alexander Aff. ¶¶ _____. In addition to these standard offerings, a CLEC may seek new or additional unbundled transport elements through the Bona Fide Request process. See Deere Aff. ¶ _____. Performance measures, similar to those described under unbundled local loops, help ensure the timelines and reliability of provisioning this checklist item. Fioretti Aff. ¶¶ ____.

Dedicated Transport. Dedicated transport is available at standard transmission speeds of up to OC-48 between all points required by law, including wire centers or switches owned by Ameritech Illinois, a CLEC, or third parties acting on behalf of a CLEC. Deere Aff. ¶ ____; Alexander Aff. ¶ _____. Higher speeds will be provided as they become technically feasible. Deere Aff. ¶ ____; Alexander Aff. ¶ _____. Ameritech Illinois also permits CLECs to use dark fiber for dedicated transport, in conformance with the UNE Remand Order. Deere Aff. ¶¶ ____; Alexander Aff. ¶ _____. In addition, Ameritech Illinois allows CLECs to use its Digital Cross-Connect System to exchange signals between high-speed digital circuits without returning the circuits to analog electrical signals, with the same functionality that Ameritech Illinois provides its IXC customers. Deere Aff. ¶¶ ____.

Shared Transport. In accordance with the UNE Remand Order, Ameritech Illinois makes available shared transport between Ameritech Illinois central office switches, between Ameritech Illinois tandem switches, and between Ameritech Illinois tandem switches and Ameritech Illinois central office switches. Deere Aff. ¶¶ _____. Ameritech Illinois' shared transport offering also includes a transiting function to route a CLEC's local traffic to a non-Ameritech Illinois switch. This shared transport offering enables CLECs to have their local traffic carried on the same transport facilities and use the same routing tables that Ameritech Illinois uses for its own local traffic. Deere Aff. ¶ ____; Alexander Aff. ¶ _____. These CLECs may use shared transport to carry originating interexchange access traffic from, and terminating interexchange access traffic to, customers to whom the CLEC is providing local exchange service, while collecting the associated access charges. Alexander Aff. ¶ _____. Ameritech Illinois also enables CLECs to use shared transport to provide intraLATA toll service under tariff and the ILA, consistent with SWBT's commitments in Texas, Kansas, and Oklahoma. Deere Aff. ¶ ____; Alexander Aff. ¶ _____.

F. Checklist Item 6: Unbundled Local Switching

Ameritech Illinois also satisfies section 271(c)(2)(B)(vi), which requires that a BOC provide local switching unbundled from transport, local loop transmission, or other services. Ameritech Illinois provides CLECs unbundled local switching capability with the same features and functionality available to Ameritech Illinois' own retail operations, in a nondiscriminatory manner. Deere Aff. ¶ ____; Alexander Aff. ¶¶ _____. Ameritech Illinois will also provide tandem switching and packet switching in accordance with the UNE Remand Order and FCC rules.²⁹

²⁹ The UNE Remand Order also established a limited obligation to unbundle packet switching for advanced services. Ameritech Illinois currently has no packet switching for advanced services within its existing network that meet the unbundling criteria. However, if Ameritech Illinois were to deploy any packet switching for advanced services meeting the

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Deere Aff. ¶ _____. Performance measures, similar to those described under unbundled local loops, help ensure the timelines and reliability of provisioning this checklist item. Fioretti Aff. ¶ _____.
¶ _____.

Available Facilities and Functions. Ameritech Illinois provides requesting carriers access to line-side and trunk-side switching facilities, plus the features, functions, and capabilities of the switch. Id. ¶ ____; Alexander Aff. ¶ ____; see also Texas 271 Order, 15 F.C.C. Rcd. at 18520-21, ¶¶ 336-338. Ameritech Illinois' offerings include, among other things, the connection between a loop termination and a switch line card, Deere Aff. ¶ ____; the connection between a trunk termination and the trunk card, id. ¶ ____; all vertical features the switch is capable of providing, id. ¶ ____; and any technically feasible routing features, id. The various unbundled switch port types are listed in Mr. Deere's affidavit (¶ ____) and CLECs can request additional port types through the BFR process. Id. ¶ _____. Ameritech Illinois also provides CLECs with the necessary cross-connects for local switching. Id. ¶ _____. Ameritech Illinois provides CLECs access to all call origination and completion capabilities of the switch, including capabilities for intraLATA and interLATA calls. Id. ¶ _____.

Billing. Ameritech Illinois also furnishes CLECs with usage records that enable them to collect from their customers all exchange access toll, and reciprocal compensation charges associated with these capabilities. Id.; Alexander Aff. ¶ _____. Ameritech Illinois gives any CLEC using Unbundled Local Switching a Daily Usage Feed showing per-call billing detail for each line-side ULS port. Alexander Aff. ¶ _____.

unbundling requirements, Ameritech Illinois' interconnection agreements contain a binding legal commitment to provide CLECs with unbundled access to such packet switching.

Customized Routing. Ameritech Illinois provides two methods by which CLECs using unbundled local switching may have OS/DA calls custom routed according to their own specifications: Advanced Intelligent Network (“AIN”) and line class codes. Deere Aff. ¶¶ _____. AIN is the standard method (id. ¶ ____), which has been used in SWBT states for some time and which was introduced in the Ameritech region in the Fall of 2000. AIN is a vendor-independent network architecture that allows the creation of customized telecommunications services. In a few low-volume applications where AIN is not technically feasible (such as for hotel/motel services, certain coin services, and ports using voice-activated dialing), Ameritech Illinois employs line class codes to custom-route CLEC calls. Id. ¶ _____. CLECs also may request non-AIN custom routing for OS/DA through the BFR process. Id. ¶ _____.

G. Checklist Item 7: Nondiscriminatory Access to 911, E911, Directory Assistance, and Operator Call Completion Services

1. 911 and E911

Checklist item (vii)(I) requires Ameritech Illinois to provide nondiscriminatory access to 911 and E911 services. Ameritech Illinois satisfies this requirement by providing CLECs with access to 911 and E911 services at parity with the manner in which Ameritech Illinois itself obtains such access. The obligation to do so is reflected in Ameritech Illinois’ interconnection agreements. Harrison Aff. ¶ ____; Alexander Aff. Attach. ____.

Access to 911 and E911 services is provided to local municipalities pursuant to tariff and contract. Ameritech Illinois provides CLEC customers access to the 911 services selected by the municipality in a manner identical to the 911 service supplied to Ameritech Illinois’ own customers. Id. ¶ _____. CLECs can provide 911 service directly to municipalities or may

interconnect with Ameritech Illinois' existing services arrangement at the request of the governmental body. Id.

Facilities-based CLECs obtain nondiscriminatory access to 911 and E911 service through dedicated trunks from their facilities to the 911 control office, which Ameritech Illinois provides at parity with what it provides to itself. See id. ¶¶ _____. Ameritech Illinois also provides CLECs with a wide variety of tools to submit, update, and correct customer information in the 911 database in the same manner as Ameritech Illinois. Among other things, Ameritech Illinois provides CLECs with all necessary street address information for the areas where the CLEC operates in order to allow the CLEC to create the necessary customer files for Automatic Location Identification ("ALI"). Id. ¶ _____. This makes administration of the Master Street Address Guide ("MSAG," which contains the criteria for routing 911 calls and identifies the responding agencies) more efficient for the 911 customer and the CLEC. It also reduces the potential for error by maintaining a single mechanized MSAG that is under the control of the 911 customer (the municipality) and utilized by all service providers who interconnect with the 911 systems provided by Ameritech Illinois. Id. ¶ _____. A CLEC can view a copy of the MSAG electronically, including individual end-user records, and can periodically obtain its own mechanized copy of the MSAG. Id.

Ameritech Illinois and its 911 Database Services Provider, SCC Communications Corporation, detect and correct data errors for CLEC customers in the 911 databases in the same manner and by the same employees that detect and correct errors for Ameritech Illinois' customers. Id. ¶ _____. Each switch-based service provider is responsible for electronically uploading and maintaining the 911 database information for its customers. Id. ¶ _____. When files containing a CLEC's customer records are uploaded, the Transaction Services System ("TSS")

in the MSAG processes the file and the CLEC receives a statistical report confirming the number of records processed and an error file with any records that failed the system edits. The error file provides codes explaining the reason each record failed to pass the edits, and the CLEC is then responsible for correcting the record and resubmitting it to the TSS. Id. Ameritech Illinois also provides CLECs with an electronic comparison file containing the 911 database information for the CLEC's customers served through UNE switch ports. Id. ¶ _____. The CLEC can use that file to check accuracy and submit any necessary corrections to Ameritech Illinois. Id. This comparison process was recently implemented in Illinois and, subject to CLEC feedback, will be finalized and then posted on the SBC.CLEC.Online website. Id.

Resellers are able to provide 911 service to their customers in the same manner Ameritech Illinois does for its customers. End-user records for resale customers are included in the files that Ameritech Illinois uploads to TSS for its own customers. Id. ¶ _____. If Ameritech Illinois' error file shows error for a resale customer record, Ameritech Illinois or SCC employees correct errors that can be resolved without issuing a service order. Id. ¶ _____.

Ameritech Illinois has taken numerous steps to maintain the accuracy of the 911 database, including by giving CLECs a wide variety of new tools to ensure the accuracy of the end-user information they submit for 911 purposes. These include both dedicated 911 managers to facilitate CLEC 911 service and different electronic tools for inputting, reviewing, and correcting end-user data. Id. ¶ _____. To monitor these processes on an ongoing basis, Ameritech Illinois reports performance data on the percentage of 911 records that were updated in error (PM 103) and the average time it take to update the 911 database file (PM 104). Fioretti Aff. ¶¶ _____. Both are subject to standards that require nondiscrimination. Id.

2. Directory Assistance/Operator Services

Ameritech Illinois meets its obligations under Section 251 of the Act and Checklist Item No. (vii) (II) and (III) by providing CLECs with nondiscriminatory access to the following services:³⁰

- Operator Services (“OS”), including adjunct Operator Call Completion Services;
- Directory Assistance (“DA”) Services, including Information Call Completion/Directory Assistance Call Completion;
- Directory Assistance Listings (“DAL”) in bulk format; and
- Direct Access to the DA database on a query-by-query basis.

Rogers Aff. ¶ __.

Ameritech Illinois upgraded its OS/DA switches to make branding capability available to CLECs in Illinois utilizing shared trunking. This branding option is available to resale CLECs and facilities-based carriers that use Ameritech Illinois’ unbundled local switching. Rogers Aff. ¶ __.

In its recent UNE Remand Order,³¹ the FCC ruled that incumbent LECs are no longer required to make OS/DA services and directory assistance listings available as unbundled network elements where the incumbent LEC provides custom routing for OS/DA traffic. Custom routing allows a CLEC to route OS/DA traffic from its end user customers to an OS/DA platform of its own or another company that provides OS/DA services on behalf of the CLEC.

³⁰ FCC 96-333 Second Report and Order and Memorandum Opinion And Order (“Second Report and Order”) and CC Docket 96-98, Appendix B - Rules, Amendments to the Code of Federal Regulations (C.F.R), Part 51, Subpart D (“the FCC Rules”).

³¹ In re Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, Third Report and Order and Fourth Further Notice of Proposed Rulemaking, ¶¶ 438 – 464, (November 5, 1999).

Rogers Aff. ¶ __. Moreover, the FCC specifically declined to expand the definition of OS/DA to include an affirmative obligation “to provide directory listings updates in daily electronic batch files.” The FCC regarded such a finding as unnecessary because this obligation “already exists under Section 251(b)(3) and the relevant rules promulgated thereunder.” Neither Section 251(b)(3) nor the related FCC rules require provision of access to such listings on an unbundled basis. Rather, under these rules, Ameritech Illinois is required to make such listings available on a nondiscriminatory basis and with no unreasonable dialing delays. See also Rogers Aff. ¶ __.

Custom routing is available to CLECs throughout Illinois and is included in Illinois interconnection agreements. Rogers Aff. ¶ __; Deere Aff. ¶¶ _____. This custom routing uses the same technology used by Ameritech Illinois to route OS/DA traffic from its end offices to Ameritech Illinois’ operator switches; thus, Ameritech Illinois provides nondiscriminatory custom routing capabilities. Rogers Aff. ¶ __; Deere Aff. ¶¶ _____. Competing carriers in Illinois, therefore, can route their OS/DA traffic to a platform of their own or another provider of OS/DA services, or choose Ameritech Illinois as provider of OS/DA services on the CLEC’s behalf. Id. ¶ _____. Ameritech Illinois’ custom routing option meets the FCC’s requirements, as recently affirmed in the Kansas & Oklahoma 271 Order. Deere Aff. ¶¶ _____. Nevertheless, pursuant to the ICC’s decision in Docket No. 96-0486/96-0569, Ameritech Illinois currently makes OS/DA services available as UNEs at TELRIC-based rates. Rogers Aff. ¶ __.

Incumbent LECs are still bound by their obligations under Section 251(b)(3) to provide nondiscriminatory access to operator services, directory assistance services and directory assistance listings to competing providers. See Rogers Aff. ¶ __. Ameritech Illinois provides nondiscriminatory access to operator services, directory assistance, and directory assistance listings pursuant to Section 251(b)(3) of the Act. Id. ¶ __.

Ameritech Illinois has implemented DA Service arrangements for ___ facilities-based CLECs and ___ resale CLECs in Illinois, and has implemented OS arrangements for ___ facilities-based CLECs and ___ resellers in Illinois. Rogers Aff. ¶ ___. Operator Services provided by Ameritech Illinois include automated call assistance and manual call assistance (including operator assistance, busy line verification, busy line verification interrupt, and operator transfer service) and are identical to the services available to Ameritech Illinois itself. Id. ¶ ___. Likewise, Ameritech Illinois' DA Services offering complies with the terms of the 1996 Act and 47 C.F.R. § 51.217(c)(3). Id. ¶¶ _____. Services provided by Ameritech Illinois to CLECs are identical to the services provided by Ameritech Illinois' own retail operation and include provisioning of subscriber listing information, address and published phone numbers, and call completion. Id. ¶ ____.

Ameritech Illinois further ensures nondiscriminatory access to OS and DA by processing all calls in the order they are received from all end users accessing OS or DA (i.e. first in, first served).³² Rogers Aff. ¶ ___. Since the operator switch and the calls waiting queue cannot discern any difference among callers – handling every call on a first in, first served basis – end user customers of other carriers inherently receive exactly the same answer performance that Ameritech Illinois end-users receive. Id..

3. Directory Assistance Listings and Direct Access to DA Database

Ameritech Illinois also has obligations under the Act, FCC rules and current interconnection agreements to provide directory assistance listing (“DAL”) information. Rogers Aff. ¶ ___. Ameritech Illinois will provide DAL information in bulk format to a CLEC that

³² 47 C.F.R. §51.217 (a)(2)

chooses to provide its own DA services and has amended its interconnection agreements³³ to provide for access to DAL information to CLECs via magnetic tape, cassette or electronic transmission. Id. ¶ __. Daily updates are provided by Ameritech Illinois in compliance with 47 C.F.R. § 51.217 (c)(3)(ii). Id. In addition, Ameritech Illinois offers nondiscriminatory access to directory assistance listing information. Id. Consistent with the FCC's rule that any telephone customer should be able to access any listed number of any carrier on a nondiscriminatory basis,³⁴ Ameritech Illinois offers an agreement whereby a CLEC receives Ameritech Illinois' DA bulk listing information on a statewide, geographic area or class of service basis. Rogers Aff. ¶ __. In compliance with FCC rules,³⁵ Ameritech Illinois provides all the listings in Ameritech Illinois' DA database to such carriers regardless of the identity of the end user's underlying local exchange provider. Rogers Aff. ¶ __.

In addition, Ameritech Illinois offers CLECs physical interconnection with direct access, on a query-by-query basis, to the same DA database that is accessed by Ameritech Illinois operators for DA purposes and in the same format as is available to those operators. Rogers Aff. ¶¶ 34, 45.³⁶ Ameritech Illinois provides CLEC end users nondiscriminatory access to OS and DA Services through the same dialing arrangements Ameritech Illinois uses for its own

³³ See, e.g., First Amendment to Interconnection Agreement Under sections 251 and 252 of the Telecommunications Act of 1996 dated _____ between _____ and Ameritech.

³⁴ 47 C.F.R. §51.217(c)(3)(i).

³⁵ 47 C.F.R. §51.217(c)(3)(ii); Local Competition Second Report and Order, 11 F.C.C. Rcd. at 19460; and FCC 98-271, paragraphs 248-251 in Bell South's application for 271 relief in Louisiana.

³⁶ Agreement, Appendix Direct.

customers.³⁷ Rogers Aff. ¶ ___. As a result, there is no unreasonable dialing delay, consistent with the FCC's rules issued in CC Docket 96-98.³⁸ Rogers Aff. ¶ ___.

H. Checklist Item 8: White Pages Directory Listings

In accordance with § 271(c)(2)(B)(viii) of the Act, Ameritech Illinois provides “[w]hite pages directory listings for customers of the other carrier’s telephone exchange service,” by ensuring that its directory publishing affiliate publishes and integrates the primary listings of a CLEC’s customers located within the geographic scope of White Page (“WP”) directories serving Ameritech Illinois’ customers, in the same manner (and integrated into the same directory) as the listings of Ameritech Illinois’ customers. Kniffen-Rusu Aff. ¶ ___. CLEC, Ameritech Illinois and independent telephone company listings in Ameritech Illinois’ WP directories all include the subscriber’s name, address and telephone number. Id. Ameritech Illinois takes reasonable and appropriate steps to ensure that CLEC customer listings are maintained with the same accuracy and reliability as Ameritech Illinois customer listings. Id.

A primary WP listing for each end user is furnished to a CLEC providing services via resale and UNE-P in the same manner (including size, font, and typeface) as Ameritech Illinois provides for its own retail customers. Kniffen-Rusu Aff. ¶ ___. In addition, carriers who provide local exchange service through unbundled local switching, or some combination of unbundled network elements and their facilities, or solely through their own facilities, can also include their customers’ primary listings in Ameritech Illinois’ WP directory in the same manner as Ameritech Illinois provides for its own retail customers. Id. As of May 2, 2001, directories

³⁷ 47 C.F.R. §51.217(c)(2)

³⁸ 47 C.F.R. §51.217(b)

serving Ameritech Illinois customers contain over _____ listings of CLEC end user customers.

Id.

Ameritech Illinois provides resellers and CLECs that use UNE-P with instructions for proper submission of WP listings by offering instructions on its CLEC Handbook website (<https://clec.sbc.com>) and by offering a variety of training workshops. Kniffen-Rusu Aff. ¶ ____.

Other information regarding Ameritech Illinois' WP listings and WP directories, including directory close dates, are available to CLECs in the Forms & Exhibits and User Guide & Tech Pubs portions of the CLEC Handbook. Id. ¶ ____.

As a result of extensive negotiations in the Wisconsin collaborative, made binding in Illinois pursuant to the Plan of Record for OSS in Docket No. 00-0592, Ameritech Illinois has committed to implement an enhancement that will allow CLECs to request WP listings from Ameritech Illinois' publishing affiliate at the same time (and via the same interface) they submit an order for local service. Id. ¶ ____.

Ameritech Illinois treats all CLEC end user WP listings in the same manner it treats its own retail listings. Kniffen-Rusu Aff. ¶ ____.

The same WP database contains names, addresses, telephone numbers, directory listing format, and directory delivery information for Ameritech Illinois and CLEC end users alike. Id.

Ameritech Illinois' WP database updates the directory assistance ("DA") database each night and treats all updates in the same manner, regardless of the underlying carrier. Id. ¶ ____.

White Page directory listings for CLEC end users reach Ameritech Illinois' WP database in the same manner and within the same time frame as White Page directory listings for Ameritech Illinois' retail end users. Id.

Ameritech Illinois offers CLECs the option of receiving two verification review reports. Kniffen-Rusu Aff. ¶ ____.

Ameritech Illinois' performance standards require it to correct 95% of the corrections by the second review or otherwise waive the charge for the second verification

report. Id. ¶ __. Ameritech Illinois must correct 99% of corrections requested in the second review in time for the final published directory. Id.; Fioretti Aff. ¶ __.

Each subscriber of CLEC resale and UNE-P services will receive delivery of the Ameritech Illinois white pages directory in the same manner and at the same time that copies are delivered to Ameritech Illinois' retail subscribers during the annual delivery of newly published directories. Kniffen-Rusu Aff. ¶ __. In addition, Ameritech Illinois has agreed to provide secondary delivery (i.e. between annual delivery dates) of White Pages directories to customers of CLEC resellers and UNE-P users on the same basis as its own retail customers. Id. Ameritech Illinois has arranged with its directory publishing affiliate so that a CLEC may include customer-contact information (for example, the CLEC's, business office, residence office, and repair bureau telephone numbers) in Ameritech Illinois' WP directory on the same "index-type" informational page that lists Ameritech Illinois contact information. Kniffen-Rusu Aff. ¶ __.

I. Checklist Item 9: Nondiscriminatory Access to Telephone Numbers

Checklist Item (ix) requires that Ameritech Illinois provide, "[u]ntil the date by which telecommunications numbering administration guidelines, plans, or rules are established, nondiscriminatory access to telephone numbers for assignment to the other carrier's telephone exchange service customers."³⁹ The FCC's rules, in turn, require that an ILEC permit competing providers to have access to telephone numbers that is identical to the access the ILEC provides itself.⁴⁰ Ameritech Illinois is in full compliance with this checklist item.

³⁹ 47 U.S.C. § 271(c)(2)(B)(ix)

⁴⁰ 47 C.F.R. § 51.217(e)(i)

Prior to March 29, 1999, Ameritech Illinois' parent Ameritech served as Central Office ("CO") Code Administrator in its region. In that capacity, Ameritech satisfied the requirement of 47 U.S.C. § 271(c)(2)(B)(ix) by providing non-discriminatory access to telephone numbers for all carriers in accordance with the Central Office Code Assignment Guidelines ("Assignment Guidelines") and the NPA Code Relief Planning Guidelines ("NPA Relief Guidelines").

Mondon Aff. ¶ ___. Pursuant to those industry-standard procedures, Ameritech assigned 934 NXX central office codes (representing 9.34 million telephone numbers) to 23 different CLECs in Illinois. Id. ¶ ___.

On March 29, 1999, NeuStar (formerly Lockheed Martin) assumed CO code administration responsibilities in Illinois, and Ameritech has had no responsibility for number administration since that time. Id. ¶ ___. Although it is no longer a CO code administrator, and no longer performs any functions with regard to number administration or assignment, Ameritech (as a service provider) continues to adhere to numbering administration rules and industry guidelines. Id.

J. Checklist Item 10: Nondiscriminatory Access to Databases and Associated Signaling Necessary for Call Routing and Completion

Checklist Item 10 requires a BOC to provide "[n]ondiscriminatory access to databases and associated signaling necessary for call routing and completion." 47 U.S.C.

§ 271(c)(2)(B)(x). Ameritech Illinois provides for nondiscriminatory access to all its signaling networks and call-related databases used for call routing and completion and therefore is in full compliance with this checklist item.

Interoffice Signaling Systems. Ameritech Illinois provides nondiscriminatory access to its signaling links and signal transfer points ("STPs") on an unbundled basis. Deere Aff. ¶ __; 47

C.F.R. § 51.319(e). SS7 Interconnection Service is provided to CLECs for their use in furnishing SS7-based services to their end users or the end users of other CLECs subtending the service switching point (“SSP”) or STP of the interconnecting CLEC. Deere Aff. ¶ _____. This arrangement, which is identical to the one used by Ameritech Illinois itself, permits CLECs to use Ameritech Illinois’ SS7 signaling network for signaling between CLEC switches, between CLEC switches and Ameritech Illinois’ switches, and between CLEC switches and the networks of other parties connected to the Ameritech Illinois SS7 network. Id.; 47 C.F.R. § 51.319(e)(1).

When a CLEC purchases unbundled switching capability from Ameritech Illinois, Ameritech Illinois provides access to its signaling network in the same manner that it provides such access to itself. Deere Aff. ¶ _____. Because all unbundled switching elements are provided on switches that Ameritech Illinois uses to provide service to its own customers, all signaling functions are identical. Id.; 47 C.F.R. § 51.319 (e)(1)(A).

Ameritech Illinois’ Signaling Access Service provides access to the Ameritech Illinois SS7 network. Deere Aff. ¶ _____. Access to the network is provided by subscribing to a Dedicated Network Access Link as described in Ameritech Operating Companies Tariff F.C.C. No. 2, Section No. 8, and a dedicated STP port for telecommunications carriers with their own STPs and/or SSPs. Id. Access is also provided for the carrier subscribing to the Unbundled Local Switching Service. Id.

Call-Related Databases

The FCC’s rules interpret Section 271(c)(2)(B)(x) of the Act to require nondiscriminatory access to call-related databases. 47 C.F.R. § 52.319(e). As described more fully in the affidavits of Messrs. Deere and Alexander, Ameritech Illinois meets the requirements of the Act by providing CLECs nondiscriminatory unbundled access to Ameritech Illinois’ Advanced

Intelligent Network (“AIN”) database, the Toll Free Calling/800 database, nondiscriminatory unbundled access to the same Line Information Database (“LIDB”) and Calling Name (“CNAM”) delivery used by Ameritech Illinois, and Ameritech Illinois’ LIDB Service Management System, known as the Operator Services Marketing Order Processor (“OSMOP”). Deere Aff. ¶¶ ____; Alexander Aff. ¶¶ _____. All data in each of these databases is maintained in accordance with the confidentiality requirements of the Act. Deere Aff. ¶ ____.

K. Checklist Item 11: Number Portability

Number portability refers to the ability of end users to retain, at the same location, their existing telephone numbers without impairment of quality, reliability, or convenience when they switch from one telecommunications carrier to another. Mondon Aff. ¶ _____. Checklist item (xi) requires the provision of number portability in full compliance with FCC’s regulations. Ameritech Illinois has not only met its obligations under the Act and implementing regulations through its deployment of long-term number portability (“LNP”) throughout Illinois, but has done so in a collaborative manner through its participation and leadership in state and federal sponsored industry groups. Mondon Aff. ¶ ____; Deere Aff. ¶¶ ____.

Ameritech Illinois has deployed LNP not only in the top Metropolitan Statistical Areas (“MSAs”) specified within the FCC’s requirements, but also in all of the other exchanges it serves. As a result, as of February 2001, Ameritech Illinois has equipped all ____ switches within its operating territory with LNP capabilities, representing 100 percent of its access lines. In so doing, Ameritech Illinois has adhered to the FCC’s technical, operational, architectural and administrative requirements. Ameritech Illinois’ full compliance with the Act and federal regulations has allowed competing carriers to port over ____,000 telephone numbers from Ameritech Illinois through March 2001. Mondon Aff. ¶¶ ____.

Ameritech Illinois' most recent interconnection agreements with facilities-based providers include provisions stating that both parties will provide LNP in conformance with the Act and FCC rules. Mondon Aff. ¶ ___. Further, Ameritech Illinois has implemented a series of performance standards to ensure the timely provisioning of LNP. Fioretti Aff. ¶¶ ____.

In addition, Ameritech Illinois continues to be an active participant in numerous industry groups to resolve issues and to develop and improve processes on a going-forward basis. Mondon Aff. ¶ ___. For example, Ameritech Illinois has agreed to use an unconditional 10-digit trigger ("UCT") feature for LNP orders, and UCT became available on most such orders beginning April 1, 2000. Mondon Aff. ¶ ___. For the limited instances where UCT will not be available, and for the conversion of certain large, complex services, Ameritech Illinois works with the CLEC to arrange a coordinated cutover. Mondon Aff. ¶ ____.

The FCC has ordered "an exclusively federal recovery mechanism" for the costs associated with LNP implementation of "long-term number portability."⁴¹ In adopting such a mechanism, the FCC allowed incumbent local exchange carriers to recover their directly related, carrier-specific costs by establishing tariffs with the FCC for a monthly number-portability charge starting no sooner than February 1, 1999, and a number portability query-service charge. Mondon Aff. ¶ ___. Ameritech Illinois' tariffs for monthly and query charges comply with the FCC's Memorandum Opinion and Order in CC Docket 95-116 (rel. Dec. 14, 1998, as amended Jan. 8, 1999), and with the FCC's July 1, 1999 order directed specifically to Ameritech Illinois tariffs (FCC Tariff No. 2, Transmittal Nos. 1186 & 1187). Mondon Aff. ¶¶ ____.

⁴¹ Third Report and Order, Telephone Number Portability, 13 F.C.C. Rcd. 11,701, ¶ 29 (1998) ("Third Report and Order").

L. Checklist Item 12: Local Dialing Parity

Checklist item (xii) requires Ameritech Illinois to provide: “Nondiscriminatory access to such services or information as are necessary to allow the requesting carrier to implement local dialing parity in accordance with the requirements of section 251(b)(3).” 47 U.S.C.

§ 271(c)(2)(B)(xii). In turn, section 251(b)(3) of the Act provides the following requirements:

Dialing Parity – The duty to provide dialing parity to competing providers of telephone exchange service and telephone toll service, and the duty to permit all such providers to have nondiscriminatory access to telephone numbers, operator services, directory assistance, and directory listing, with no unreasonable dialing delays.

Ameritech Illinois is in compliance with this checklist item. Deere Aff. ¶¶ _____. The FCC Rules (§ 51.207) specify that local dialing parity means that telephone exchange service customers within a local calling area may dial the same number of digits to make a local telephone call, regardless of the identity of the customer’s or the called party’s carrier. Ameritech Illinois’ interconnection arrangements fully meet this requirement. Deere Aff. ¶ _____. The FCC’s Second Report and Order, ¶ 71, stated that local dialing parity is achieved through the implementation of the interconnection, number portability and nondiscriminatory access to telephone number requirements of Section 251 of the Act. Ameritech Illinois has implemented each of these in accordance with the Act and the FCC Rule. Deere Aff. ¶ _____.

Ameritech Illinois’ interconnection arrangements do not require any CLEC to use access codes or additional digits to complete local calls to Ameritech Illinois customers. Deere Aff. ¶ _____. Nor are Ameritech Illinois customers required to dial any access codes or additional digits to complete local calls to the customers of any CLEC. Id. The interconnection of Ameritech Illinois networks and the network of CLECs are seamless from a customer perspective. Id. Since the CLEC central office switches are connected to the trunk side of the

Ameritech Illinois tandem or central office switches in the same manner as Ameritech Illinois and other local exchange companies, there are no differences in dialing requirements or built-in delays for CLEC customers. Id.

M. Checklist Item 13: Reciprocal Compensation

Checklist item 13 requires Ameritech Illinois to provide reciprocal compensation arrangements in accordance with section 252(d)(2) of the 1996 Act, which governs charges for transport and termination of traffic subject to the reciprocal compensation requirements of section 251(b)(5). Ameritech Illinois is subject to numerous interconnection agreements that provide for reciprocal compensation in accordance with ICC orders and the FCC's rules (subject to negotiation or a regulatory or judicial determination as to the effect of the FCC's April 27, 2001 order on remand regarding Intercarrier Compensation for ISP-bound Traffic).⁴² Alexander Aff. ¶ _____. Ameritech Illinois has paid all undisputed amounts due for reciprocal compensation through _____, 2001. Id. ¶¶ _____.

The ICC has reviewed and approved Ameritech Illinois' rates for reciprocal compensation, finding them consistent with TSLRIC costing principles. There are separate rates for tandem and end office switching, tandem transport and termination, which reflect the costs of the interconnection facilities used. Alexander Aff. ¶¶ ____.

The FCC has found that a BOC's payment of inter-carrier compensation on traffic delivered to Internet Service Providers ("ISPs") is "irrelevant to checklist item 13." Kansas & Oklahoma 271 Order, ¶ 251. The ICC has ordered Ameritech Illinois to pay such compensation

⁴² Order on Remand and Report & Order, In re Intercarrier Compensation for ISP-Bound Traffic, CC Docket Nos. 96-98 & 99-68 (rel. April 27, 2001).

under certain interconnection agreements. Alexander Aff. ¶ _____. Ameritech Illinois is in compliance with all such ICC orders, pending judicial review. Id.

N. Checklist Item 14: Resale

Section 271(c)(2)(B) (xiv) requires a BOC to make “telecommunications services . . . available for resale in accordance with the requirements of sections 251(c)(4) and 252(d)(3).” Ameritech Illinois’ resale offerings meet this requirement and allow CLECs to enter the local market in Illinois with virtually no capital investment or delay.

The telecommunications services that Ameritech Illinois provides CLECs for resale are identical to the services that Ameritech Illinois furnishes its own retail customers. Alexander Aff. ¶ _____. CLECs are able to resell these services to the same customer groups and in the same manner as Ameritech Illinois. Id. Ameritech Illinois offers wholesale discounts on promotional offerings lasting more than 90 days. Id. ¶¶ _____. For retail services that Ameritech Illinois offers to a limited group of customers (such as grandfathered services), Ameritech Illinois allows resale to the same group of customers to which it sells the services, in accordance with 47 C.F.R. § 51.615. Id. ¶ _____. Ameritech Illinois’ customer-specific contracts are available for resale to similarly situated customers without triggering termination liability charges or transfer fees to the end user. Id. ¶ _____. Ameritech Illinois is subject to numerous performance standards designed to ensure that resellers can access pre-ordering, ordering and provisioning, maintenance and repair, and billing functions for resold services in an efficient and nondiscriminatory manner. Fioretti Aff. ¶¶ _____.

Ameritech Illinois has effective tariffed rates for resold services which reflect a wholesale discount based on the ICC’s avoided cost model. Those wholesale rates have been incorporated into interconnection agreements, and are available to all CLECs. Id. ¶¶ _____.

On January 9, 2001, the U.S. Court of Appeals for the D.C. Circuit issued its ASCENT decision, in which it effectively concluded that Ameritech Illinois' separate advanced services affiliate – ASI North – was obligated, under section 251(c), to sell to competing carriers at a wholesale discount the telecommunications services it provides at retail. ASCENT, 235 F.3d at 668. To comply with this new requirement, a model interconnection agreement is available from ASI North. A CLEC seeking an interconnection agreement with ASI North can review that agreement and either adopt it as is or pursue negotiations with ASI North. *Habeeb Aff.* ¶¶ _____. As the FCC urged in the Kansas & Oklahoma 271 Order, Ameritech Illinois has thus “act[ed] promptly to come into compliance with section 251(c)(4) in accordance with the terms of the court’s decision.” Kansas & Oklahoma 271 Order ¶ 252 n.768.⁴³

III. AMERITECH ILLINOIS’ ENTRY INTO THE INTERLATA SERVICES MARKET IN ILLINOIS WILL PROMOTE COMPETITION AND FURTHER THE PUBLIC INTEREST

A. Consumers Are Clearly Benefiting from Bell Company Entry into the In-Region, InterLATA Market

Real-world experience has conclusively demonstrated the benefits of BOC interLATA entry, not only for the long-distance market but also for the local market as well. On the long-distance side, it is no coincidence that New York and Texas – the first two states for which a BOC received interLATA approval – are the only states in which AT&T offers its Local One Rate ® promotional plan, which bundles local and long distance into one package offering. *Heritage Aff.* ¶ _____. Shortly after Ameritech Illinois’ affiliate, Southwestern Bell, received

⁴³ Under the terms of the ASCENT decision, ASI North’s new obligations are not limited to resale under section 251(c)(4). Therefore, the model agreement, to the extent appropriate and applicable, will provide for interconnection, unbundled network elements, and collocation pursuant to the requirements of section 251(c). *See Habeeb Aff.* ¶¶ 29-65.

approval under section 271 for Texas, AT&T instituted and vigorously promoted its One Rate plan through direct mail and telemarketing in Austin, Dallas, Houston, San Antonio and south Texas, offering consumers 60 minutes of free long distance – and slashing long-distance rates in half – to sweeten the pot. Id. ¶¶ _____. Following suit, WorldCom responded to Southwestern Bell's entry with the introduction of three new rate plans (MCI WorldCom 7¢ Anytime, 9¢ Anytime, and WorldCom Weekends) along with options for bundling local, local toll and long distance calling, as well as discounts on calling features. Id. ¶ _____. Southwestern Bell's recent entry into the Kansas and Oklahoma long distance markets prompted a similar response, with AT&T offering 30 free minutes of long distance to selected residential customers in those states. Id. ¶ _____.

Full competition in the long-distance market has proven to be an effective stimulus to local competition as well. Between January 2000 (six months before Southwestern Bell received approval under Section 271) and March 2001 (eight months after), the key indicators of local competition all skyrocketed. Id. ¶ _____. The number of lines captured by facilities-based CLECs, operational physical collocations, unbundled loops and overall wholesale orders more than doubled. Id. And the number of unbundled loop and port combinations increased fivefold. Id. Thus, allowing the BOC to enter and compete in the long-distance market has spurred the long-distance carriers to meaningfully enter and compete with the BOC in the local market.

We can expect that the consistent track record of full competition in all markets that follows section 271 approval will be repeated in Illinois. That track record has demonstrated that approval of Ameritech Illinois' application will bring concrete benefits to Illinois consumers – and to their family pocketbooks, as well as to businesses of all sizes.

B. Ameritech Illinois Is Subject to Comprehensive Performance Reporting and Monitoring Requirements

One factor the FCC may consider in its public interest analysis is whether the BOC will continue to satisfy checklist requirements after it has received approval to enter the long-distance market. “[T]he fact that a BOC will be subject to performance monitoring and enforcement mechanisms would constitute probative evidence that the BOC will continue to meet its section 271 obligations and that its entry would be consistent with the public interest.” Texas 271 Order, ¶ 420.

As a condition of its approval of the SBC/Ameritech merger, the ICC approved and ordered Ameritech Illinois to implement a system of automatic remedies to help enforce Ameritech Illinois’ wholesale performance standards. *Fioretti Aff.* ¶ ____.⁴⁴ The remedy plan is based on similar plans developed in collaborative proceedings in Texas and approved by the FCC in its Texas and Kansas & Oklahoma 271 orders. *Id.* ¶ 274. Like those plans, Ameritech Illinois’ plan provides for two classes or “tiers” of performance remedies. *Id.* ¶ 278. The first tier applies to customer-affecting measurements (such as how long it takes to install or restore service) and are paid to the affected CLEC. *Id.* The second tier applies to competition-affecting measurements (such as interface availability), and are paid to the Illinois State Treasury. *Id.* Most remedies for both tiers accrue “per occurrence,” which means that a remedy base is multiplied by the number of transactions affected. *Id.* Statistical analysis is used to address the impact of random variation in performance. *Id.* ¶ 280.

⁴⁴ Certain CLECs have asked the ICC to approve a different remedy plan. That request is now before the ICC in Docket No. 01-0120. As demonstrated herein, the existing ICC-approved plan is sufficient to satisfy this aspect of the public interest test.

The FCC has identified the following as the important characteristics of an effective performance assurance plan (New York 271 Order, ¶ 433):

- “potential liability that provides a meaningful and significant incentive to comply with the designated performance standards;
- clearly-articulated, pre-determined measures and standards, which encompass a comprehensive range of carrier-to-carrier performance;
- a reasonable structure that is designed to detect and sanction poor performance when it occurs;
- a self-executing mechanism that does not leave the door open unreasonably to litigation and appeal;
- and reasonable assurances that the reported data is accurate.”

As we show below, Ameritech Illinois’ remedy plan satisfies each of the FCC’s criteria.

1. Potential Liability Provides Meaningful Incentive to Comply

The amount of potential remedies at stake is easily sufficient to provide a meaningful incentive for Ameritech Illinois to meet its performance obligations. The method of computing remedies is virtually identical to that used in Texas, Kansas, and Oklahoma, which the FCC has already found “discourage[s] anti-competitive behavior by setting the damages and penalties at a level above the simple cost of doing business” and “represents a meaningful incentive . . . to maintain a high level of performance.” Texas 271 Order, ¶¶ 423-24. Like the Texas, Kansas and Oklahoma plans, Ameritech Illinois’ plan sets a “cap” on remedies under the plan. Fioretti Aff. ¶ 286. The cap amount is set at 36% of Ameritech Illinois’ net return, like the amount of the cap described in the Texas 271 Order; it is estimated at over \$____ million for the current year, which exceeds the \$____ million found sufficient and meaningful in the Kansas & Oklahoma 271 Order, ¶ _____. Fioretti Aff. ¶ _____. Moreover, as the FCC has recognized, remedies under the plan are not the only means to ensure compliance; Ameritech Illinois remains subject to

additional penalties, most notably the suspension or termination of interLATA relief. Texas 271 Order, ¶ 424.

2. Clearly-Articulated Performance Measures

Throughout this brief, Ameritech Illinois has described the numerous performance measures and standards that are designed to assure compliance with various checklist items. As that discussion shows, Ameritech Illinois' performance measures are comprehensive in scope, rigorous in application, and exhaustive in detail. There are over 160 performance measurements, covering all three competitive entry methods (unbundled access, resale, and interconnection) and all five OSS functions (pre-ordering, ordering, provisioning, repair and maintenance, and billing). Fioretti Aff. ¶¶ _____. They are further disaggregated into categories (such as product or service type and geographic area) and supported by clearly articulated definitions and business rules, which are all set forth in a detailed User Guide. Id. ¶ _____. Ameritech Illinois' performance measures and standards reflect substantial input from CLECs (in fact, they were presented to the ICC for approval in a joint motion of all participants in the collaborative) and from the ICC and the FCC. See id. ¶¶ _____. They are also similar to the measures and standards approved by the FCC in its Texas and Kansas & Oklahoma orders. Fioretti Aff. ¶¶ _____.

In addition, Ameritech Illinois' performance measurements and standards are designed to keep up with industry and legal developments. As is the case in Texas, Kansas and Oklahoma, Ameritech Illinois' performance plan provides for comprehensive reviews, every six months, that include all interested CLECs. Fioretti Aff. ¶¶ _____. As the FCC has recognized, this "continuing ability of the measurements to evolve is an important feature because it allows the

Plan to reflect changes in the telecommunications industry and in the . . . market.” Texas 271 Order, ¶ 425.

3. Reasonable Structure to Detect and Sanction Poor Performance

As described above, the structural elements of Ameritech Illinois’ remedy plan are virtually identical to those in Texas, Kansas and Oklahoma, which the Commission has found “appear reasonably designed to detect and sanction poor performance when it occurs.” Texas 271 Order, ¶ 426; Kansas & Oklahoma 271 Order, ¶ 276.

4. Self-Executing Mechanism

Ameritech Illinois’ remedy plan provides for self-executing enforcement mechanisms that are swift and sure. It requires Ameritech Illinois to submit performance reports for each month by the 20th day of the following month. Fioretti Aff. ¶ _____. Any applicable remedy amounts would be due thirty days afterwards. Id. ¶ _____. The remedy payment is automatic and cannot be withheld except in certain limited circumstances (e.g., where the performance failure was the fault of the CLEC) defined in the plan. Id. Even in those circumstances, the plan provides for an expedited dispute resolution process, and Ameritech Illinois is required to invoke that process before the payment due date. Id. The FCC has found these mechanisms to be “reasonably self-executing” and “generally comparable to the mechanisms [it] found satisfactory in the Bell Atlantic New York Order.” Texas 271 Order, ¶ 427.

5. Accuracy of Reported Data

Third-party audits provide reasonable assurance that the performance data used in the remedy plan are reliable. The initial audit, performed by KPMG, is underway. In addition, Ameritech Illinois’ proposed plan sets forth a procedure under which a CLEC can request a “mini-audit” to address specific concerns.

**IV. AMERITECH ILLINOIS WILL PROVIDE INTERLATA SERVICES IN
COMPLIANCE WITH THE REQUIREMENTS OF SECTION 272**

This section will be added and filed at the FCC.

CONCLUSION

For the reasons set forth above, Ameritech Illinois respectfully requests that it be granted authority to provide in-region InterLATA services in Illinois.

Respectfully submitted,

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